UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 23 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL #7009168000007669220
RETURN RECEIPT REQUESTED

Mr. Richard Granberg
Safety, Health and Environmental Compliance Officer
MPI Research
54943 North Main Street
Mattawan, Michigan 49071

Re: Notice of Violation
Compliance Evaluation Inspection
MID 048 989 891

Dear Mr. Granberg:

On May 15, 2013 a representative of the U.S. Environmental Protection Agency inspected the MPI Research facility located in Mattawan, Michigan. As a large quantity generator of hazardous waste, MPI Research is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate MPI Research's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by MPI Research, EPA's review of records pertaining to MPI, and the inspector's observations, EPA has determined that MPI has unlawfully stored hazardous waste without a license or interim status as a result of MPI's failure to comply with certain conditions for a license exemption under Mich. Admin. Code. r. 299.9306(1)-(3) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the license exemption conditions with which MPI Research was out of compliance at the time of the inspection in paragraphs 1- 6, below.

Many of the conditions for a RCRA license exemption are also independent requirements that apply to licensed and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(p) and (q) the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption conditions identified in paragraphs 1-6 are also

independent TSD requirements incorporated from Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(p) and (q). Accordingly, each failure of MPI Research to comply with these conditions is also a violation of the corresponding requirement in Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(p) and (q) [40 C.F.R. Part 265].

At the time of the inspection, MPI Research was out of compliance with the following large quantity generator license exemption conditions:

1. Date When Each Period of Accumulation Begins

Under MAC R. 299.9306(1)(b) [40 C.F.R. § 262.34(a)(2)], a large quantity generator must clearly mark each container holding hazardous waste with the date upon which each period of accumulation begins.

At the time of the inspection, MPI Research maintained containers that were not marked with the date upon which each period of accumulation of hazardous waste began. Specifically, the inspector observed the following:

One 55-gallon drum located in the 90 Day Accumulation Area of the Drum Room marked as waste flammable solids, but not marked with the date upon which each period of accumulation of hazardous waste began and the hazardous waste codes;

Two 55 gallon drums located in the 90 Day Storage Area of the Drum Room one drum marked as a corrosive and the second drum marked as a hydrochloric acid corrosive, but not marked with the date upon which each period of accumulation of hazardous waste began and the hazardous waste codes; and

One 55-gallon plastic drum located in the 90 Day Storage Area of the Hazardous Waste Storage Building Drum Room was observed marked as a corrosive, but not marked with the date upon which each period of accumulation of hazardous waste began and the hazardous waste codes.

MPI Research, therefore, violated the above-reference storage container management requirement. However at the time of the inspection, facility personnel provided accumulation dates for each of the four containers mentioned above. Thus, no further action is necessary for the above-referenced requirement.

2. Hazardous Waste Container Labeling

Under MAC R. 299.9306(1)(c) also code of the waste, 299.9306(1)(b)[40 C.F.R. § 262.34(a)(3)], a large quantity generator must label or clearly mark each container holding hazardous waste with the words "Hazardous Waste."

At the time of the inspection, MPI Research inappropriately managed the following containers:

Two 5-gallon containers located in the Satellite Accumulation Area (SSA) of Room M-

2514 of the Test Material Control Area (TMC) containing acetone was observed not marked as a hazardous waste with the hazardous waste codes;

One 55-gallon drum located in the Satellite Accumulation Area (SSA) of the Drum Room observed labeled as xylene/paraffin waste and a flammable solid, but not marked as a hazardous waste with the hazardous waste codes;

Two 55 gallon drums located in the 90 Day Storage Area of the Drum Room one drum marked as a corrosive and the second drum marked as a hydrochloric acid corrosive, but not marked as a hazardous waste with the hazardous waste codes; and

One 55 gallon drum located in the Less than 90 Day Storage Area of the Hazardous Waste Storage Building containing hydrochloric acid waste not marked as a hazardous waste with the hazardous waste codes.

MPI Research, therefore, violated the above-reference storage container management requirement. However at the time of the inspection, facility personnel provided hazardous waste labels were provided with the hazardous waste codes. Thus, no further action is necessary for the above-referenced requirement.

3. Contingency Plan and Emergency Procedures

Under MAC R. 299.9306(1)(d) [40 C.F.R. § 262.34(a)(4) and 265.52(c) and (d)], a large quantity generator contingency plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as an emergency coordinator (see § 265.55), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates. .

Review of the MPI Research Emergency Action Plan did not show the name, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator. MPI Research, therefore, failed to comply with the above-referenced contingency plan requirement.

4. Preparedness and Prevention

Under MAC R. 299.9306(1)(d) [40 C.F.R. § 265.37(a)&(b)], a large quantity generator must attempt to make arrangements as appropriate for the type of waste handled at the facility and the potential need for the services of local authorities.

At the time of the inspection, no coordination efforts between MPI Research and local emergency response agencies were available for review to documented arrangements made with local authorities. MPI Research, therefore, failed to comply with the above-referenced requirement.

5. Training

A large quantity generator of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. *See* MAC R. 299.9306(1) [40 C.F.R. §§ 262.34(a)(4) and 265.16(a)]. Facility personnel must successfully complete this training program within six months after the date of their employment or assignment to a facility or to a new position at a facility, and must take part in an annual review of this initial training thereafter. *See* MAC R. 299.9306(1) [40 C.F.R. §§ 262.34(a)(4) and 265.16(b) and (c)].

With respect to this training program, a large quantity generator must maintain the following documents and records at its facility:

> 1) The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
>
> 2) A written job description for each position at the facility related to hazardous waste management;
>
> 3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and
>
> 4) Records that document that the training or job experience described above has been given to and completed by facility personnel. *See* MAC R. 299.9306(1) [40 C.F.R. §§ 262.34(a)(4) and 265.16(d)].

At the time of the inspection, MPI Research did not have the following:

1) A list of each position at the facility related to hazardous waste management and the name of the employee filling such position(s);
2) A written description for each position related to hazardous waste management at the facility; and
3) Training records for the following personnel:
    a. Larry Mckee –calendar year 2012
    b. Richard Granberg – calendar year 2011 and 2013

While MPI Research provided training records on June 28, 2013 and April 23, 2014, training records were missing for the above-mentioned personnel for the respective years. MPI, therefore, failed to comply with the above-referenced training requirements.

6. Weekly Container Inspections

Under MAC R. 299.9306(1)(a)(i); 299.9614 [40 CFR §§ 262.34(a)(1)(i); 265.174], a

large quantity generator must inspect areas where hazardous waste containers are stored. Additionally, it is required that a large quantity generator document and maintain records of the inspections in an inspection log or summary for not less than three years from the date of the inspection. *See* MAC R. 299.9306(1)(a)(i).

At the time of the inspection, weekly inspection documentation was not provided for calendar years 2011, 2012, and 2013. MPI Research, therefore, failed to comply with the above-referenced weekly container inspection requirement. However on April 23, 2014, MPI Research provided a container inspection log for 2011, 2012, and 2013 to demonstrate compliance with the weekly inspection requirement. Thus, no further action is necessary for the above-referenced requirement.

Summary: By failing to comply with the conditions for a license exemption, above, MPI became an operator of a hazardous waste storage facility, and was required to obtain a Michigan hazardous waste storage license. MPI failed to apply for such a license. MPI's failure to apply for and obtain a hazardous waste storage license violated the requirements of Mich. Admin. Code. r. 299.9502(1), 299.9508 and 299.9510 [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)].

Based on information provided by MPI, EPA's review of records pertaining to MPI, and the inspector's observations, EPA has determined that MPI violated RCRA requirements related to hazardous waste determinations and universal waste, as described in paragraphs 7-8, below.

MPI Research violated the following generator requirements:

7. Hazardous Waste Determination
Under MAC R. 299.9302(1) [40 CFR § 262.11], a generator must determine whether its waste is hazardous. Additionally, a generator must keep records of any test results, waste analyses, or other determinations made for at least three years from the date that the waste was last sent for treatment, storage or disposal. *See* MAC R. 299.9307 [40 CFR § 262.40(c)].

At the time of the inspection, MPI Research did not maintain all hazardous waste determinations on-site for all the waste generated at the facility and provided incomplete hazardous waste determinations to review. The two hazardous waste determinations that were provided during the inspection were determined to be incomplete due to insufficient information. MPI Research, therefore, failed to comply with the above-referenced generator requirements. However, hazardous waste determinations were provided on June 28, 2013. Thus, no further action is necessary for the above-referenced requirement.

8. Universal Waste Requirement
MPI is a small quantity handler of universal waste because it accumulates 5,000 kilograms (11,000 lbs) or less of universal waste at any time.

Under MAC R. 299.9228(4)(c)(iv)[40 CFR § 273.14(e)], a small quantity handler of universal waste must label or clearly mark each lamp or a container or package in which such lamps are contained with any one of the following phrases: "Universal Waste-Lamps," "Waste Lamps" or "Used Lamps."

At the time of the inspection, MPI Research's containers of lamps were not labeled with the phrase "Universal Waste-Lamps," "Waste Lamps" or "Used Lamps." MPI Research, therefore, failed to comply with the above-referenced universal waste requirements. However, at the time of the inspection labels were placed on the lamp containers. Thus, no further action is necessary for the above-referenced requirement.

Under MAC R. 299.9228(4)(e)(i)[40 CFR § 273.13(d)(1)], a small quantity handler of universal waste must manage pharmaceutical universal waste in a manner to prevent release of universal waste or components of waste by containing the universal waste in structurally sound packaging that is compatible with contents, will prevent breakage and kept closed.

At the time of the inspection, one 55-gallon drum located in room M-2467 of the TMC was observed open. MPI Research, therefore, failed to comply with the above-referenced universal waste requirements. However, at the time of the drum was closed. Thus, no further action is necessary for the above-referenced requirement.

Under MAC R. 299.9228(4)(a)[40 CFR § 273.15(a)-(c)], a large small handler of universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. The handler may make this demonstration by:

> (1) Placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received;
>
> (2) Marking or labeling each individual item of universal waste (e.g., each battery or thermostat) with the date it became a waste or was received;
>
> (3) Maintaining an inventory system on-site that identifies the date each universal waste became a waste or was received;
>
> (4) Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers of universal waste became a waste or was received;
>
> (5) Placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received; or

(6) Any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

At the time of the inspection and following the inspection, MPI Research was unable to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or was received. MPI Research personnel provided a start date for the lamps, but an accumulation start date for the pharmaceutical waste was not provided. MPI Research, therefore, failed to comply with the above-referenced universal waste requirements.

At this time, EPA is not requiring MPI Research to apply for a Michigan hazardous waste storage license so long as it immediately establishes compliance with the conditions for a license exemption outlined in paragraphs 1 – 6, above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, you have taken related to paragraphs 3, 4, 5, and 7. You should submit your response to Cindy Dabner U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604."

If you have any questions regarding this letter, please contact Cindy Dabner, of my staff, at ***dabner.cindy@epa.gov*** or 312-886-5890.

Sincerely,

Sherry A. Kamke

for Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Nadine Deak (deakn@michigan.gov)
John Craig (craigj@michigan.gov)
Lonnie Lee (leel@michigan.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR8J
77 WEST JACKSON BLVD
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: MPI RESEARCH

EPA ID NUMBER: MID 048 989 891

ADDRESS: 54943 North Main Street, Mattawan, MI 49071

DATE OF INSPECTION: May 15, 2013

EPA INSPECTOR: Cindy Dabner
Environmental Scientist

PREPARED BY:

Cindy Dabner
Compliance Section 2

Nov 13, 2014
Date

ACCEPTED BY:

Julie Morris, Chief,
Compliance Section 2

11/28/14
Date

Purpose of the Inspection

This inspection was an evaluation of MPI Research's compliance with hazardous waste regulations found at Michigan Administrative Code (MAC) and Title 40 of the Code of Federal Regulations (40 CFR), Parts 260 through 279. Inspector Cindy Dabner of the U.S. Environmental Protection Agency Region 5 conducted the inspection. The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation (CEI). The site notified as a large quantity generator (LQG).

Participants

U.S. Environmental Protection Agency-
Cindy Dabner, U.S. EPA Inspector U.S. EPA Region 5
dabner.cindy@epa.gov
312-886-5890

Representatives of MPI Research-
Lisa B. Sexton, Manager, Safety, Health and Environmental Services
lisa.sexton@mpiresearch.com
269-668-3336 ext 1899

Richard Granberg, Senior, Safety, Health and Environmental Compliance Officer
richard.granberg@mipresearch.com
269-998-3336 ext. 2050

Mary Ann Scott, Senior Director Regulatory Compliance
maryann.scott@mpiresearch.com
269-668-3336 ext. 1273

Introduction

On May 15, 2013, Inspector Dabner arrived to the site at approximately 9:15 a.m. After checking in at the front office, the inspector was directed to Mrs. Lisa Sexton, the Manager, Safety, Health and Environmental Services. Inspector Cindy Dabner presented her federal identification and explained the purpose of the visit was to conduct a hazardous waste inspection.

During the opening conference, Inspector Dabner inquired about the required safety measures to conduct during the inspection tour. Mrs. Sexton requested that Inspector Dabner wear shoe covers, a laboratory jacket, and a radiation meter device.

Inspector Dabner discussed during the opening conference, confidential business information (CBI) and the use of a camera during the inspection. MPI Research did not make any CBI claims on: (1) the information provided to the inspector; or (2) photographs taken during the inspection. Inspector Dabner provided a Small Business Resources information Sheet and Pollution Prevention Brochure to Mrs. Sexton.

Site Description

MPI Research, Inc. is located in a large compound on the east side of Main Street, immediately south of the I-94 interchange in the Village of Mattawan, Michigan. MPI Research is privately held and not publicly traded. The company engages in non-clinical evaluation of pharmaceuticals, medical devices and consumer products on a global level. The facility consists of a number of interconnected buildings totaling approximately one million square feet of offices, laboratories and support facilities. There are several large employee parking areas around the structures and three storm water retention ponds located on the site. The facility employs approximately 1100 employees and operates using two shifts of employees and a skeleton crew for third shift.

The bulk of the hazardous waste generated at the facility is from analytical instruments waste reagents. The main waste streams generated at MPI Research consist of the following: (1) acetone, methanol (D001 and F003); (2) paraffin, xylene (D001 and F003); (3) hydrochloric acid (D001); (4) potassium hydroxides (D001 and F003); (5) potassium hydroxide; (6) formaldehyde; (7) hydrochloric acid; (8) xylene, alcohol; and (9) waste oil. The facility also generates universal waste. The universal waste includes batteries and fluorescent lamps.

Site Tour

Ms. Sexton escorted the inspector during the site inspection tour. The tour started in the Analytical Area. In this area, a high performance liquid chromatographer (HPLC) is used to separate, identify, and quantity the components in a test article. Once the process is complete, the test articles are disposed of as hazardous waste and the glass pipette tips are accumulated in 55-gallon containers. The inspector observed a 55-gallon plastic drum serving in satellite accumulation area (SAA) of the Analytical Area. The 55-gallon drum was observed marked as hazardous waste with hazardous waste codes D001 and D003 along with the DOT shipping information and UN number. See Photograph #2 and #3.

In Room M-2116 of the Analytical Area, the inspector observed multiple containers ranging in various sizes amounting to approximately 55-gallons. According to the facility representative, Room M-2116 serves as a satellite accumulation area (SAA). The containers contained organic bench waste obtained from the dilution of test articles with solvents. Each of the containers were marked as organic waste with waste code D001. The organic bench waste is later transferred and accumulated to a 55-gallon container that is located in another building over 300 feet away in the Hazardous Waste Building. See Photograph #4 and #5.

The inspector observed a tray located on the floor of the Analytical Area holding 5-gallon containers marked as "mixed organics" with hazardous waste code D001. The facility representative stated that the area on the floor serves as a SAA. According to the facility representative, once the 5-gallon containers are full, the hazardous waste is transferred to a 55-gallon drum serving as a SAA in another building over 300 feet away in the Hazardous Waste Building. See Photograph #6.

In the Instrument Area near room M-2117, the inspector observed a 55-gallon drum accumulating TOMTEC test article trays hazardous waste in the SAA. The 55-gallon drum was

observed marked as hazardous waste with waste codes D001 and F003 with the DOT shipping information and UN number. See Photograph #7, #8 and #9.

In the Bio-Analytical Area, the inspector observed a 55-gallon drum labeled as non-hazardous universal pharmaceutical waste and marked as TOMTEC Tips Laboratory Waste. See Photograph#10, #11 and #12.

In Room M-2514 of the Test Material Control Area (TMC), ethanol is used to rinse glassware. Once the ethanol is used, it is accumulated in a 5-gallon container. A 5-gallon container was observed marked as hazardous waste with D001 waste code. According to the facility representative, once the 5-gallon is container is full, the 5 gallon container is transferred to the SAA of the Hazardous Waste Building. See Photograph #13 and #14.

In Room M-2467 of the TMC, a 55-gallon drum was observed marked as non-hazardous waste with contents listed as TOMTEC Tips Trays. See Photograph #15 and #16.

Also in Room M-2467 of the TMC, a 55-gallon drum was observed marked as universal waste with contents described as pharmaceutical liquid. The container was observed opened and not marked to indicate the length of time the pharmaceutical liquid was stored. At the time of the inspection, no inventory system was declared to identify or demonstrate the earliest date the items became a universal waste. See Photograph #17 and #18. Photo does not include the accumulation date.

In a different area of M-2467 of the TMC, two 55-gallon drums were observed marked as universal waste with contents described as pharmaceutical solid. The containers were not marked to indicate the length of time the pharmaceutical liquid stored. At the time of the inspection, no inventory system was declared to identify or demonstrate the earliest date the items became a universal waste. See Photograph #19 and #20.

In Room M-2514, waste acetone is generated from glass washing operations. During the inspection, two 5-gallon containers storing acetone were observed not marked as hazardous waste and without hazardous waste codes. See Photograph #21. The two 5-gallon containers were marked and properly labeled at the time of the inspection. See Photograph #22.

In the Plastics Room F31, special stains are mixed. Excess stains are stored in 5-gallon containers. Four 5-gallon containers were observed not kept in good condition, but marked as hazardous waste and labeled with D001 hazardous waste codes. See Photograph #23 and #24.

The tour continued to the Drum Room. The Drum Room is located near three major laboratories and serves a SAA, 90-Day Accumulation Storage Area, and a Chemical Product Storage Area. See Photograph #25 and #26.

In the SAA of the Drum Room, a 55-gallon drum was observed marked as hazardous waste with hazardous waste codes D001 and F003. The DOT shipping information and UN number provided on the hazardous waste label. See Photograph #27, #28, #29, #30, and #31.

Also, in the Drum Room, a 55-gallon drum was observed marked as non-hazardous waste containing formalin rags. See Photograph #32 and #33.

A 55-gallon drum located in the 90 Day Accumulation Area of the Drum Room was observed marked as "hazardous waste flammable solids." The drum appeared to be full. No accumulation start date was provided on the drum. Hazardous waste codes were not observed marked on the hazardous waste label. See Photograph #34.

Another 55-gallon drum located in the Drum Room was observed labeled as a xylene/ paraffin waste and a flammable solid, but not as a hazardous waste with waste codes. See Photograph #35 and #36. The 55-gallon drum served as a SAA for one of the nearby Laboratories. A hazardous waste label marked with hazardous waste codes D001 and F003 was placed on the drum at the time of the inspection. The DOT shipping information and UN was also provided at the time of the inspection. See Photograph #37 and #38.

Also in the Drum Room, two 55-gallon drums were observed not marked as a hazardous waste or with hazardous waste codes. According to the facility representative, the two drums were being stored in the 90 Day Accumulation Area. One drum was only marked as a corrosive and the second drum was marked as a hydrochloric acid corrosive waste. See Photograph #39, #40, #41 and #42. Hazardous waste labels were applied to the two drums at the time of the inspection. The accumulation state date was written as 5/15/13 on both of the containers. See Photograph #43 and #44.

The tour moved to the Hazardous Waste Storage Building. See Photograph #45. This building serves as a 90 Day Accumulation Storage Area and SAA. Several 55-gallon drums were observed marked as hazardous waste with accumulation start dates less than 90 days and hazardous waste codes of D001 and F003. See Photograph #46 and #47.

In the SAA of the Hazardous Waste Storage Area, aerosol cans are punctured to remove product residue from maintenance products. The contents of the aerosol cans are accumulated in a 55-gallon drum that is marked as hazardous waste and with hazardous waste codes of D001 and D003. The DOT shipping and UN information is listed as a waste flammable liquid (acetone, xylene, methanol). See Photograph #48.

Also located in the 90 Day Hazardous Waste Storage Building, two plastic 55-gallon drums were observed. One drum was marked as a hazardous waste with an accumulation start date of 5/3/2013. The DOT shipping information was listed as potassium hydroxide. The second drum was observed marked only as a corrosive. No hazardous waste label with an accumulation start date was provided. See Photograph #49. A hazardous waste label was placed on the drum at the

time of the inspection with accumulation start date of 5/15/2013. The DOT shipping information was listed as waste hydrochloric acid was also provided at the time of the inspection. See Photograph #50.

Also in the Hazardous Waste Storage Area, used lamps were observed not labeled as universal waste lamps. See Photograph #51. A universal waste label was provided at the time of the inspection with the accumulation start date of 5/15/13. See Photograph #52.

During the inspection, the Inspector observed fire extinguishers, spill control equipment, internal communications systems, and alarm systems. See photographs#53 and #54. A list of emergency equipment at the facility including location, physical description and capabilities were not provided in the Pollution Incident Prevention Plan dated June 2013.

Record Review

A records review was conducted following the facility tour. The inspector requested to review hazardous waste determination documents, hazardous waste manifest, land disposal restriction (LDR) forms, universal waste documents, personnel training documents, weekly inspection logs, and personnel training records for the past three years. The Inspector reviewed hazardous waste profiles, hazardous waste manifest, land disposal restriction records, and universal waste shipping records during the inspection. Training records and contingencies plan were forwarded to the inspector following the inspection.

At the time of the inspection the generator status was determined to be a large quantity generator based on the amount of hazardous waste generated within one month.

Waste Determination Documents

Two incomplete hazardous waste determinations that were provided on-site at the time of the review. The following discrepancies were noted for the two hazardous waste determinations:

Generator Profile	Date of Notification	Waste Generating Process	Constituents and Waste Code	Observation
Spent Laboratory Waste	05/15/2013	Laboratory Waste	Xylene, alcohol D001 and F003	Generator Waste Profile Form Determination basis not marked as generator knowledge or analytical testing or both
Batteries (Universal Waste) Bulk	02/16/2012	Spent Batteries	Batteries Universal Waste	Determination basis not marked as generator knowledge or

Waste determinations were not provided on-site for the following waste:

TOMTEC Tips; debris formalin rags; laboratory waste containing formaldehyde; laboratory waste containing hydrochloric acid; laboratory waste containing alcohols; and potassium hydroxide waste.

Hazardous Waste Manifest
No concerns were observed in the review of the hazardous waste manifest.

Land Disposal Restriction Documents
No concerns were observed in the review of land disposal restriction documents.

Biennial Reporting Documents
No concerns were observed with biennial reporting requirements.

Container Weekly Inspections
At the time of the review, weekly inspection documentation was not provided for calendar year 2011, 2012 and 2013.

Personnel Training Documents
Personnel training records did not contain job titles and job descriptions. Based on the training records provided the following facility personnel have not been provided did not take part in annual training:

Larry McKee - calendar Year 2012
Richard Ganberg - calendar Year 2011 and 2013

Contingency Plan and Emergency Procedures
The name, address, and phone number (office and home) of emergency coordinator was not provided in the Emergency Action Plan.

Preparedness and Prevention
Coordination efforts with local emergency response agencies were not documented and provided during the review.

Universal Waste
Universal waste containers not kept closed and labeled with the earliest date the items became a universal waste.

Closing Conference
A closing conference was conducted with Mrs. Lisa B. Sexton, Mr. Richard Granberg, and Mrs. Mary Ann Scott. The Inspector summarized the areas of concern noted during the inspection. Inspector Dabner explained how the observation notes would be reviewed and used to generate an inspection report. Inspector Dabner briefly discussed EPA's procedures for following up with the facility representative after conducting an inspection. The inspection concluded at approximately 4:45 p.m.

Post-Inspection

Prior to completion of this inspection report, Lisa Sexton and Mr. Granberg provided Inspector Dabner supplemental information. Supplemental information is provided in Attachment F- MPI Post-Inspection Document Log.

Attachments

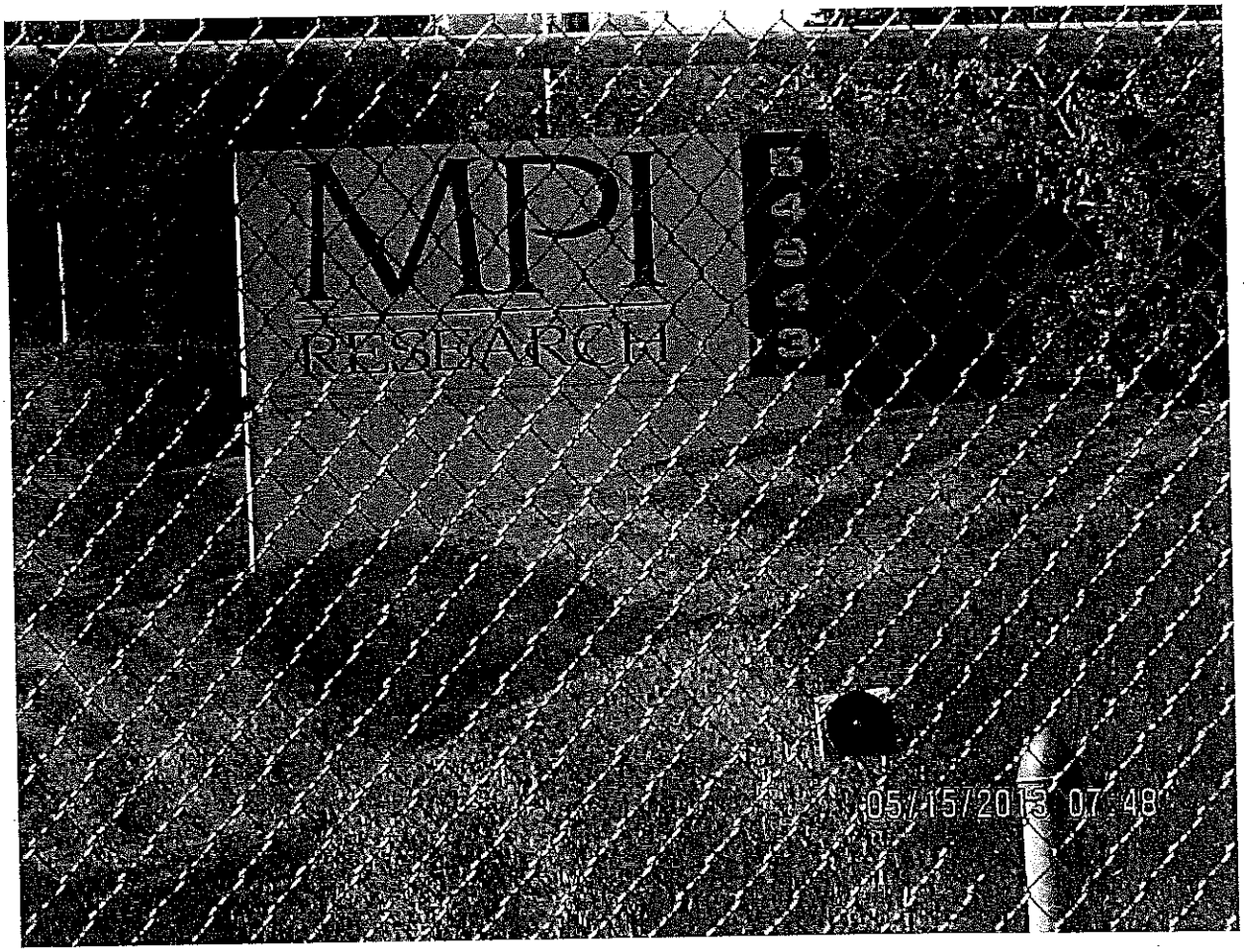
A. MPI Research Inspection Photographs
B. MPI Research Photograph Log
C. MDEQ Fully Regulated Generator Inspection Checklist for MPI Research
D. MDEQ Universal Waste Handler Inspection Report-Small Quantity Handler for MPI Research
E. MPI Research Supporting Document Log
F. MPI Research Post-Inspection Document Log

ATTACHMENT A

MPI Inspection Photographs

MID 048 989 891

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013

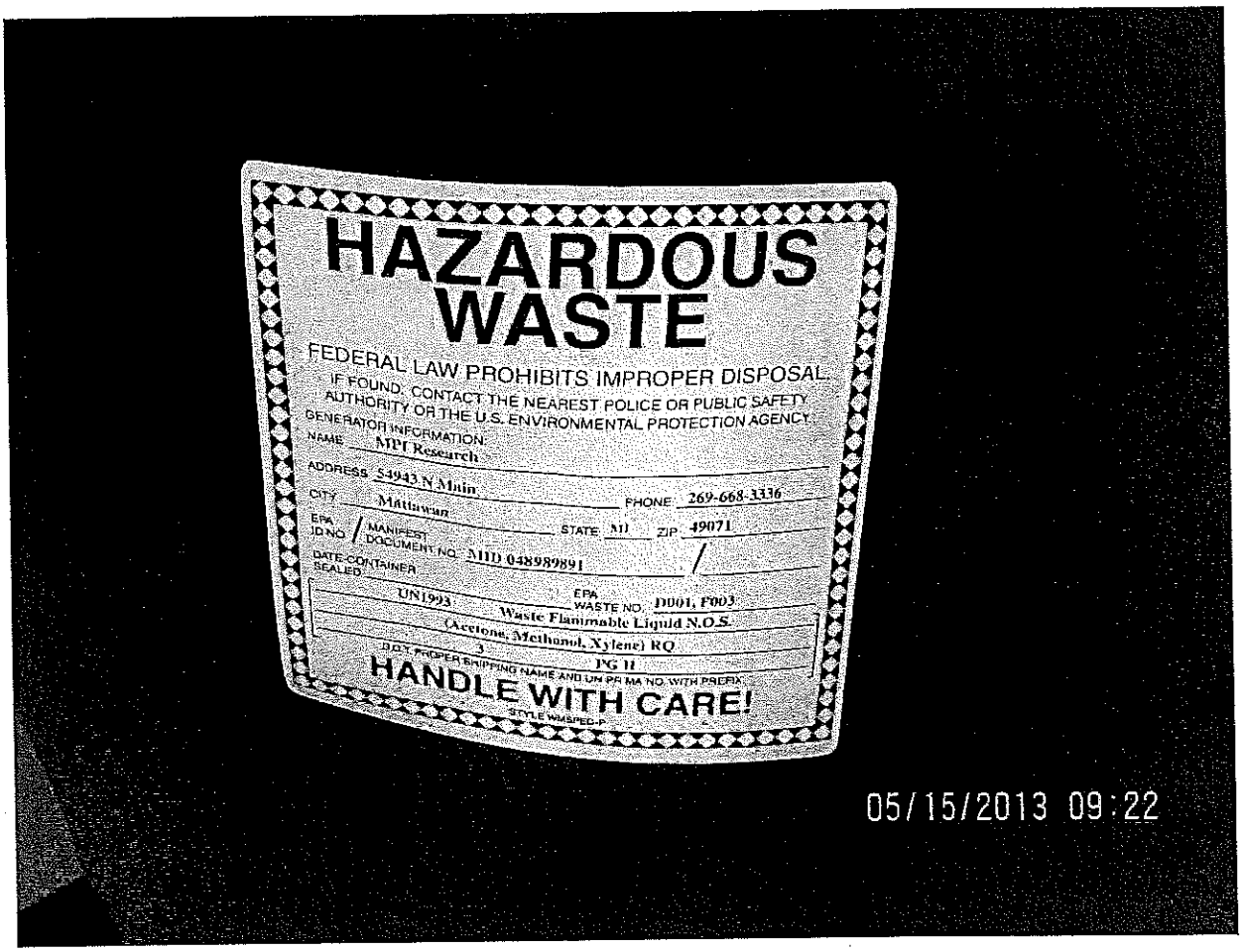


Photograph: #1
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Description: Photograph of the facility sign

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013

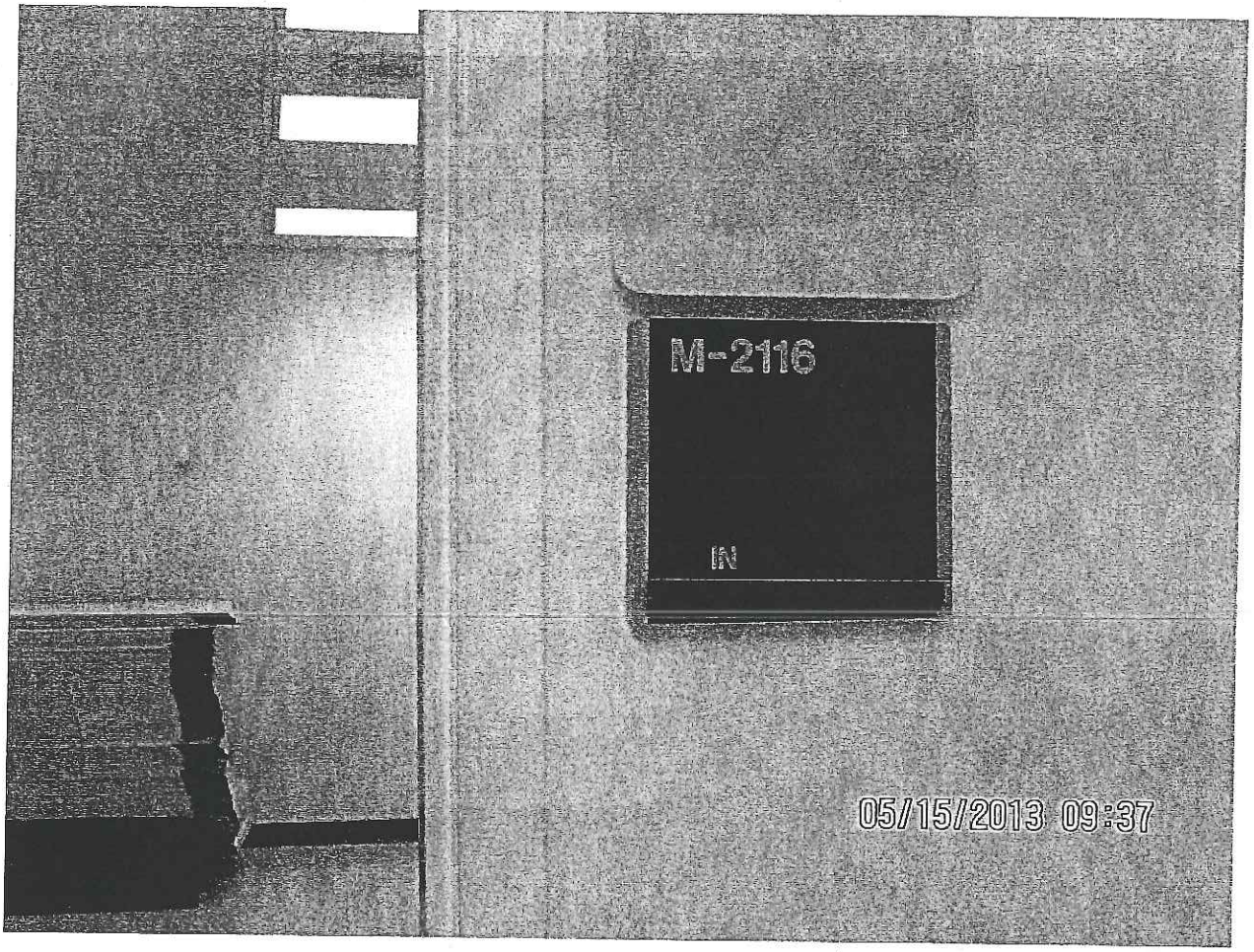
Photograph: #2
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Analytical Area
Description: A 55-gallon container containing test articles waste (acetone, methanol, xylene - D001, F003) located in the Analytical Area

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #3
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Analytical Area
Description: A closer picture of the label of the 55-gallon container containing test articles waste (acetone, methanol, xylene - D001, F003) located in the Analytical Area

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #4
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Analytical Area Room M-2116
Description: A picture of the room sign where hazardous waste is stored in 5-gallon containers.

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Photograph: #5
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Analytical Area Room M-2116
Description: A picture of the hazardous waste contained in containers ranging in various sizes in Room M-2116.

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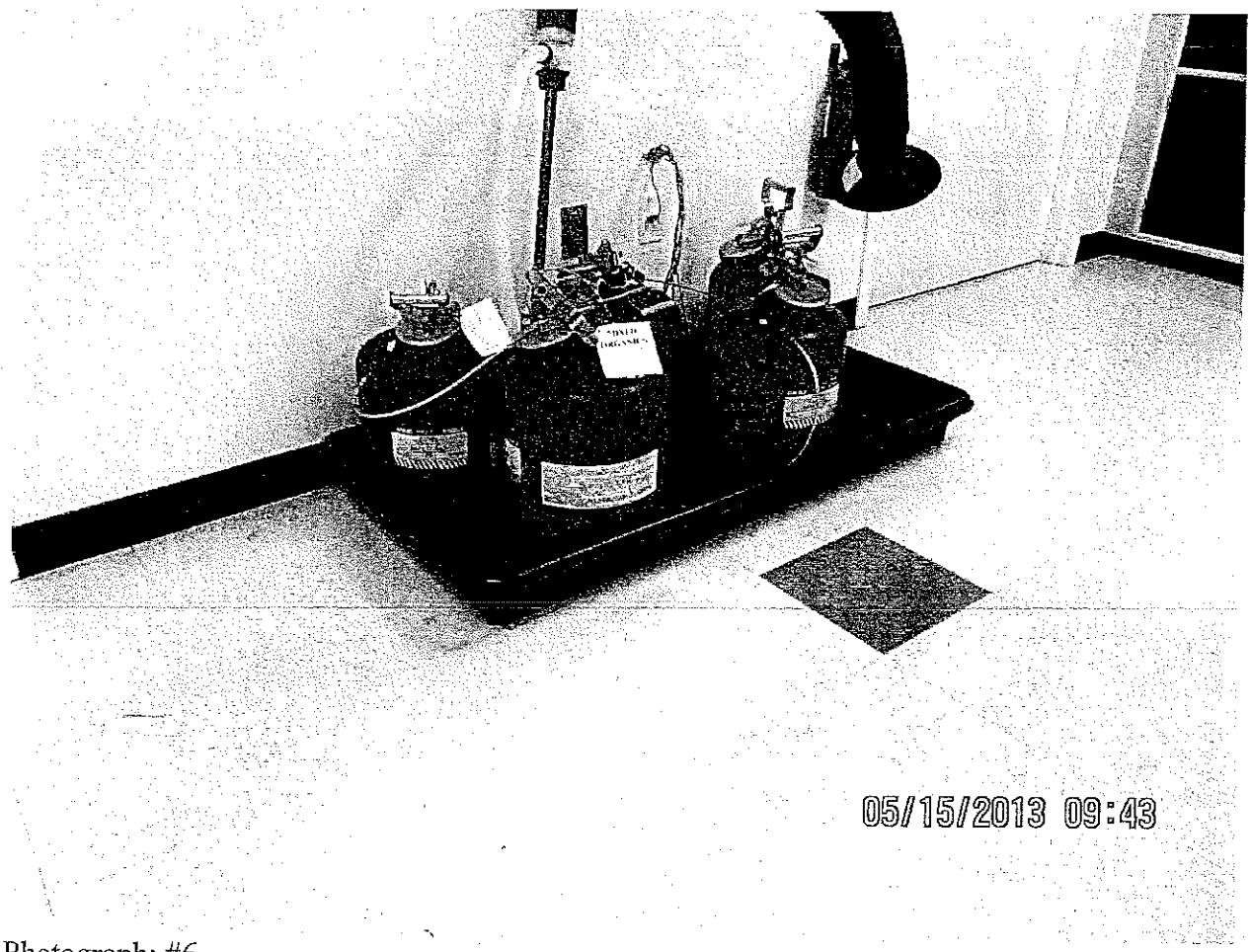

Photograph: #6
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Analytical Area
Description: A tray located on the floor of the Analytical Area holding 5-gallon containers labeled as "mixed organic waste."

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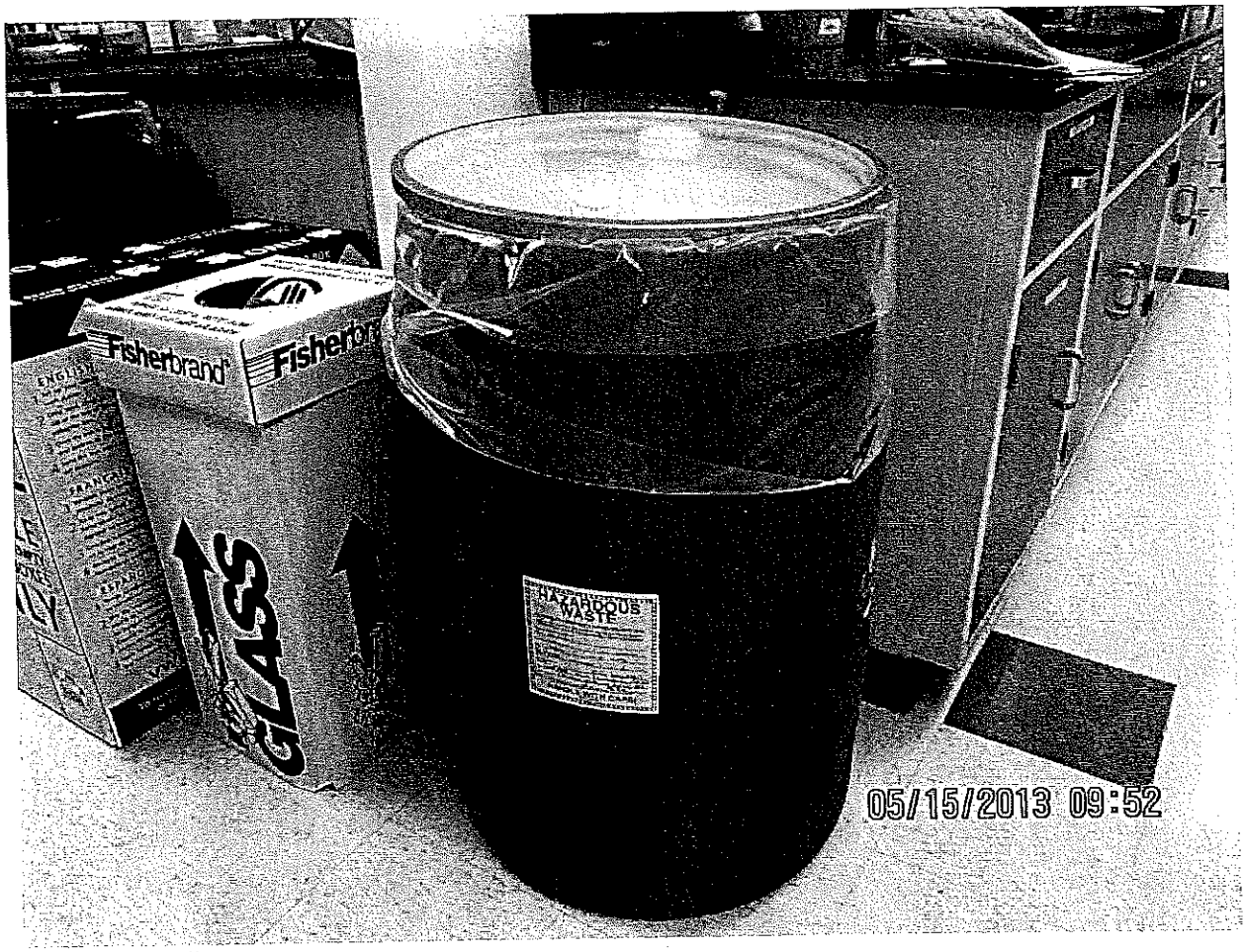

Photograph: #7
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Instrument Area Room M-2117
Description: A 55-gallon drum marked with waste codes D001 and F003 and labeled as acetone, methanol, and xylene.

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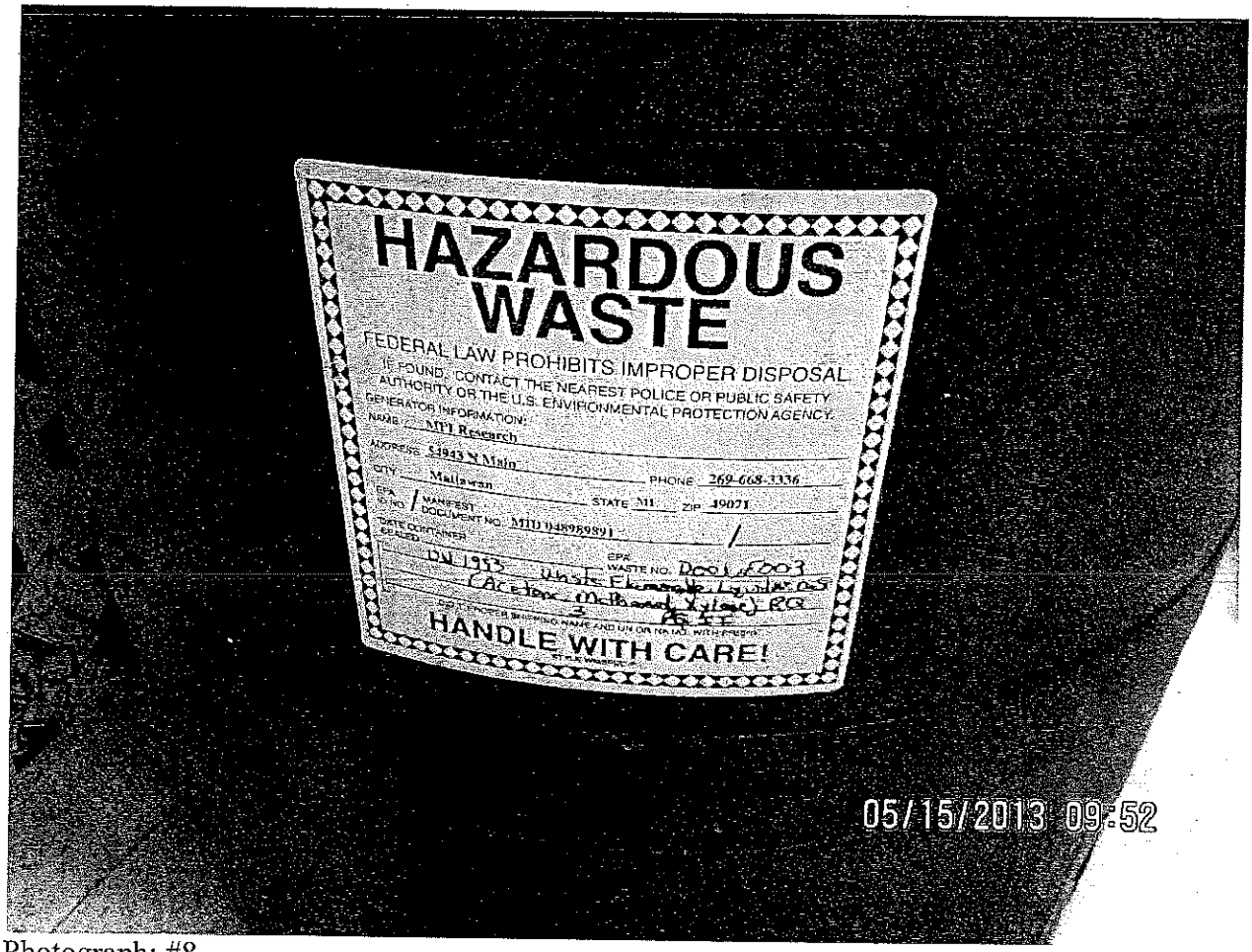

Photograph: #8
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Analytical Area Instrument Area Room M-2117
Description: A closer picture of the label on the 55-gallon drum marked with waste codes D001 and F003 and labeled as acetone, methanol, and xylene.

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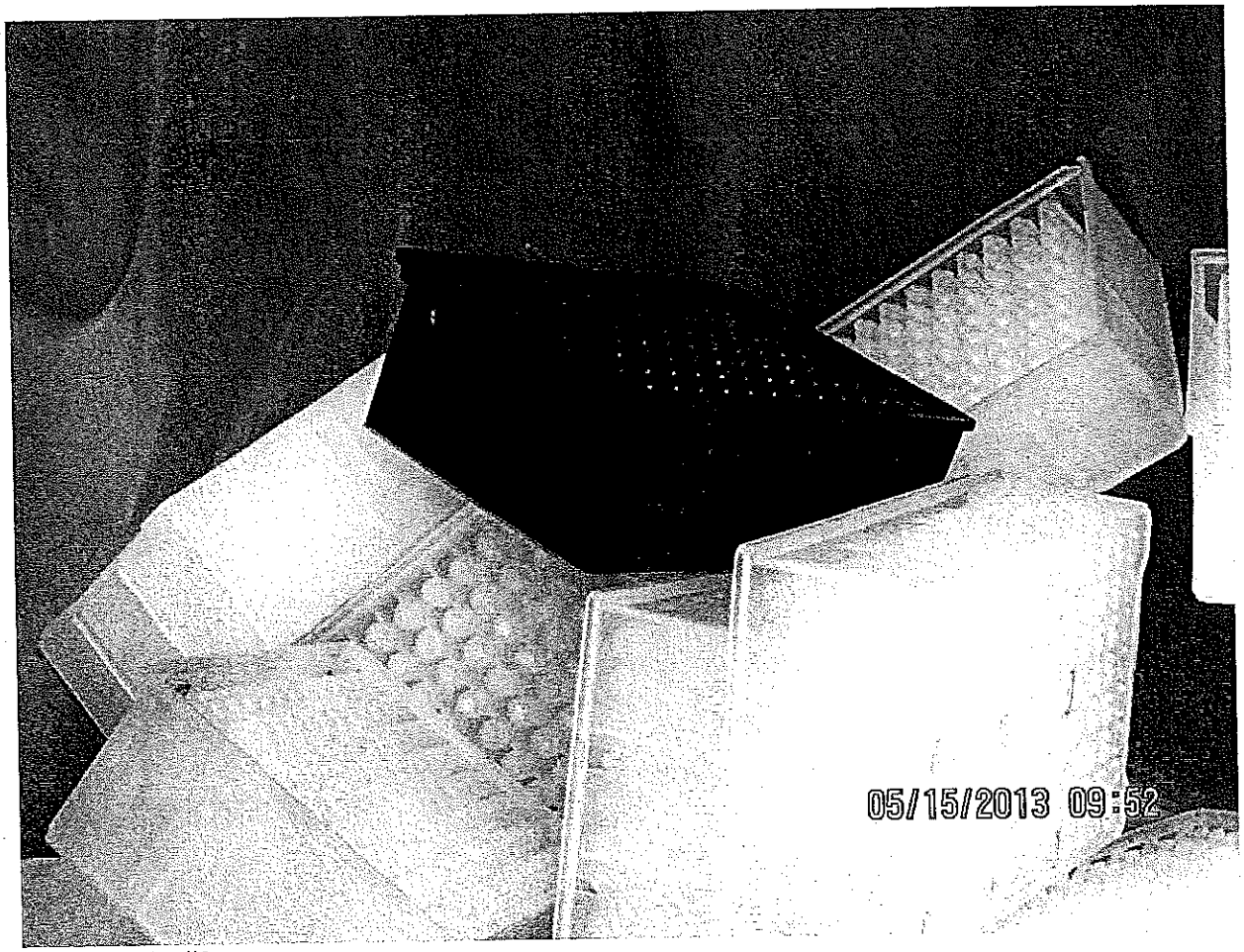

Photograph: #9
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Analytical Area Instrument Area Room M-2117
Description: A picture of the TOMTEC test article trays contained in photograph #7 and #8.

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Photograph: #10
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Bio-Analytical Area
Description: A 55-gallon drum of non-hazardous universal pharmaceutical waste marked as TOMTEC Tips Laboratory Waste.

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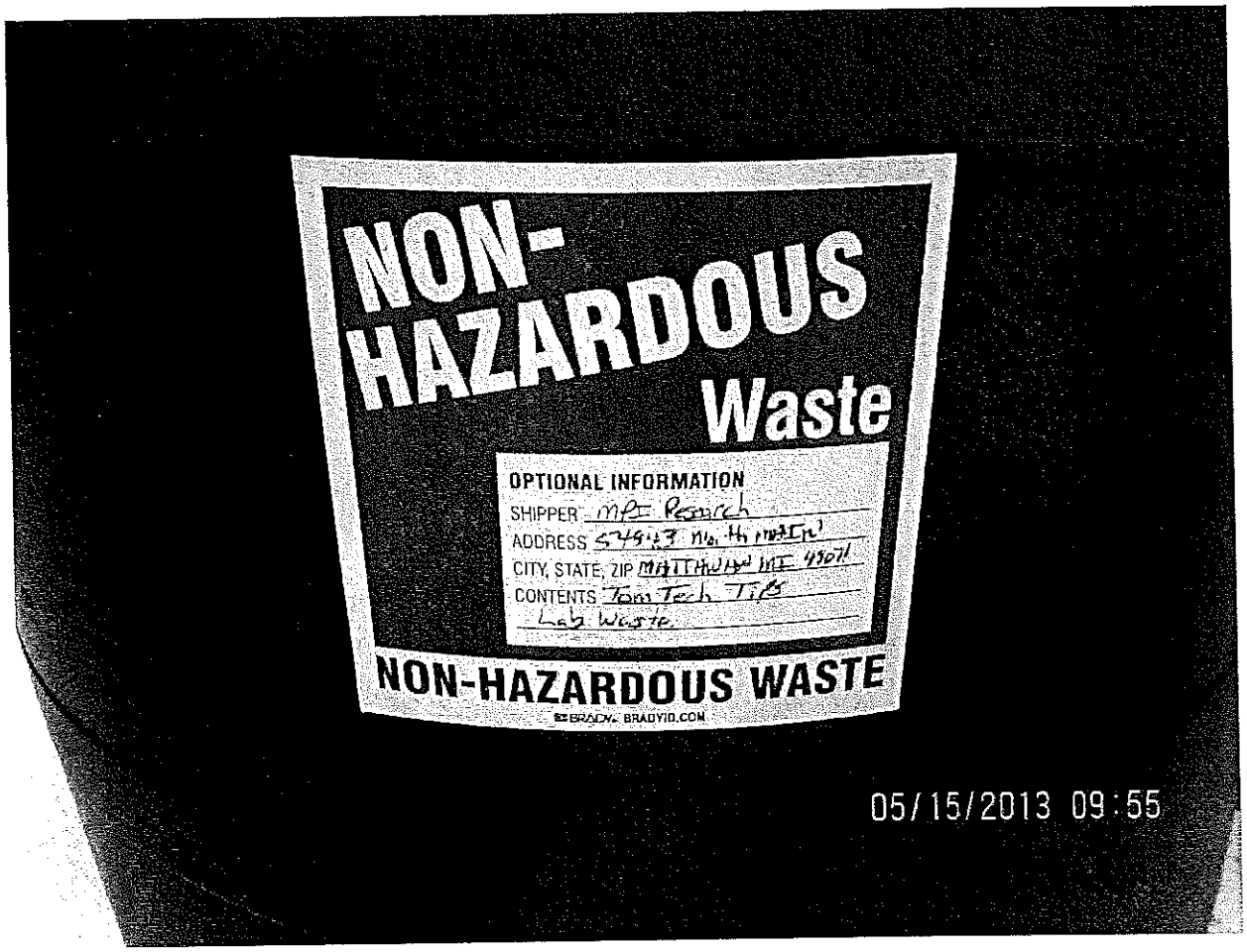

Photograph: #11
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Bio-Analytical Area
Description: A closer picture of the label of the 55-gallon drum labeled as non-hazardous universal pharmaceutical waste and marked as TOMTEC Tips Lab Waste.

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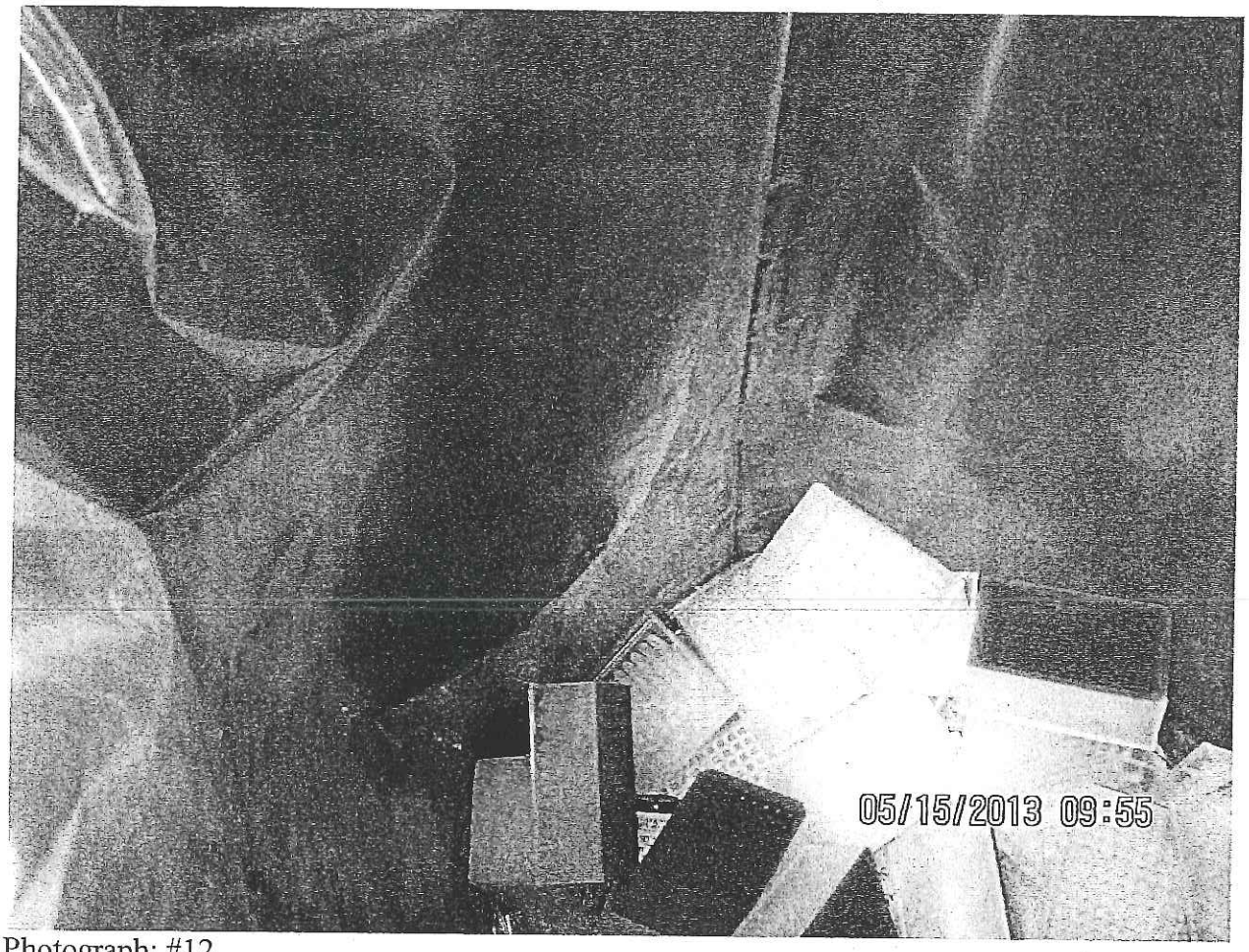

Photograph: #12
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Bio-Analytical Area
Description: A picture of the contents of 55-gallon drum of non-hazardous universal pharmaceutical waste marked as TOMTEC Tips Lab Waste.

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Photograph: #13
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Room M-2514 of the Test Material Control Area (TMC)
Description: A container was observed marked as hazardous waste with D001 waste code.

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Photograph: #14
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Room M-2514 of the Test Material Control Area (TMC)
Description: A closer picture of the 5 gallon container observed marked as hazardous waste with D001 waste code.

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Photograph: #15
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Room M-2467 of the Test Material Control (TMC) Area
Description: Non-hazardous waste with contents marked as TOMTEC Tips Trays.

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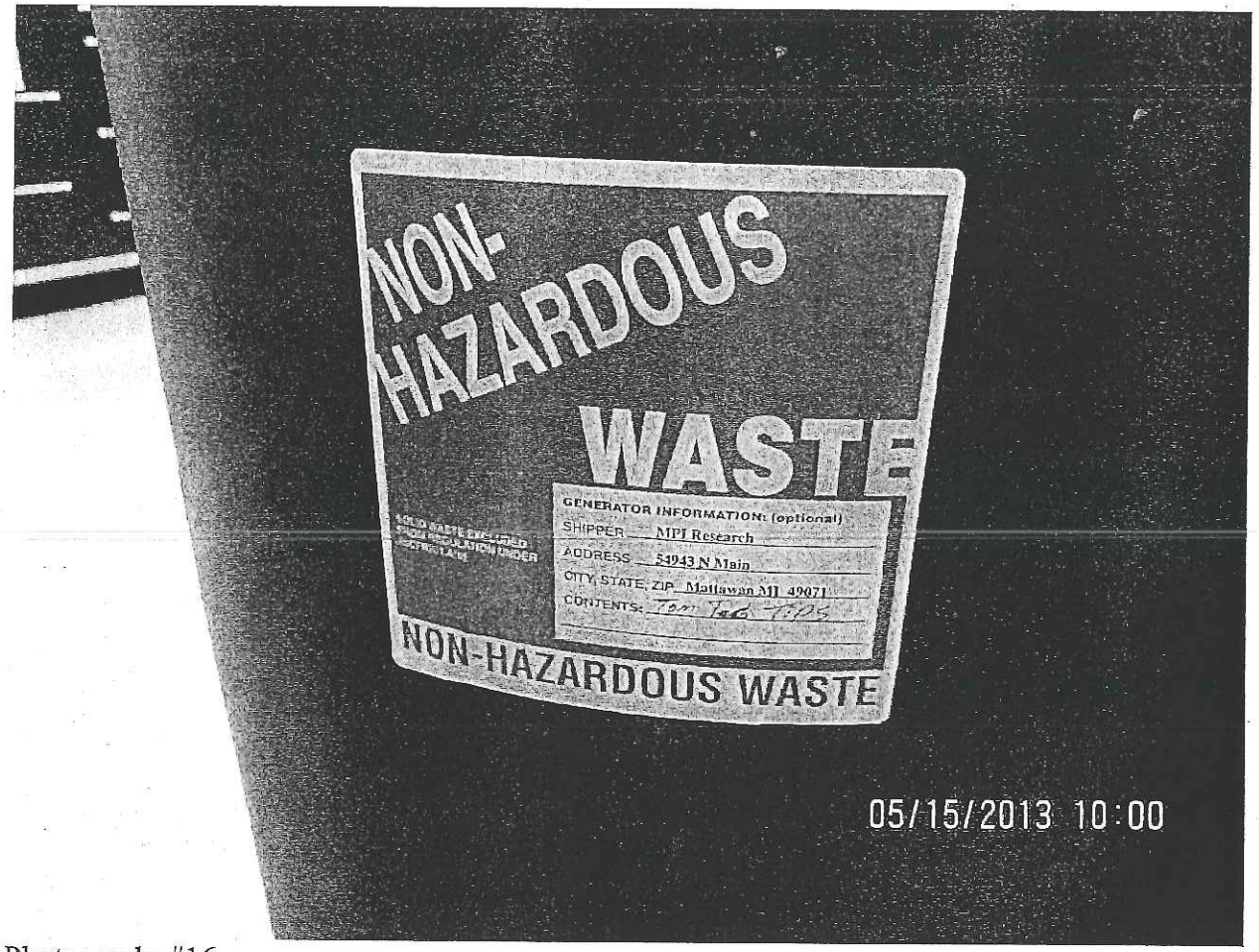

Photograph: #16
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Room M-2467 of the Test Material Control Area (TMC)
Description: A closer picture of the label of the 55-gallon drum marked as Non-hazardous waste with contents marked as TOMTEC Tips Trays.

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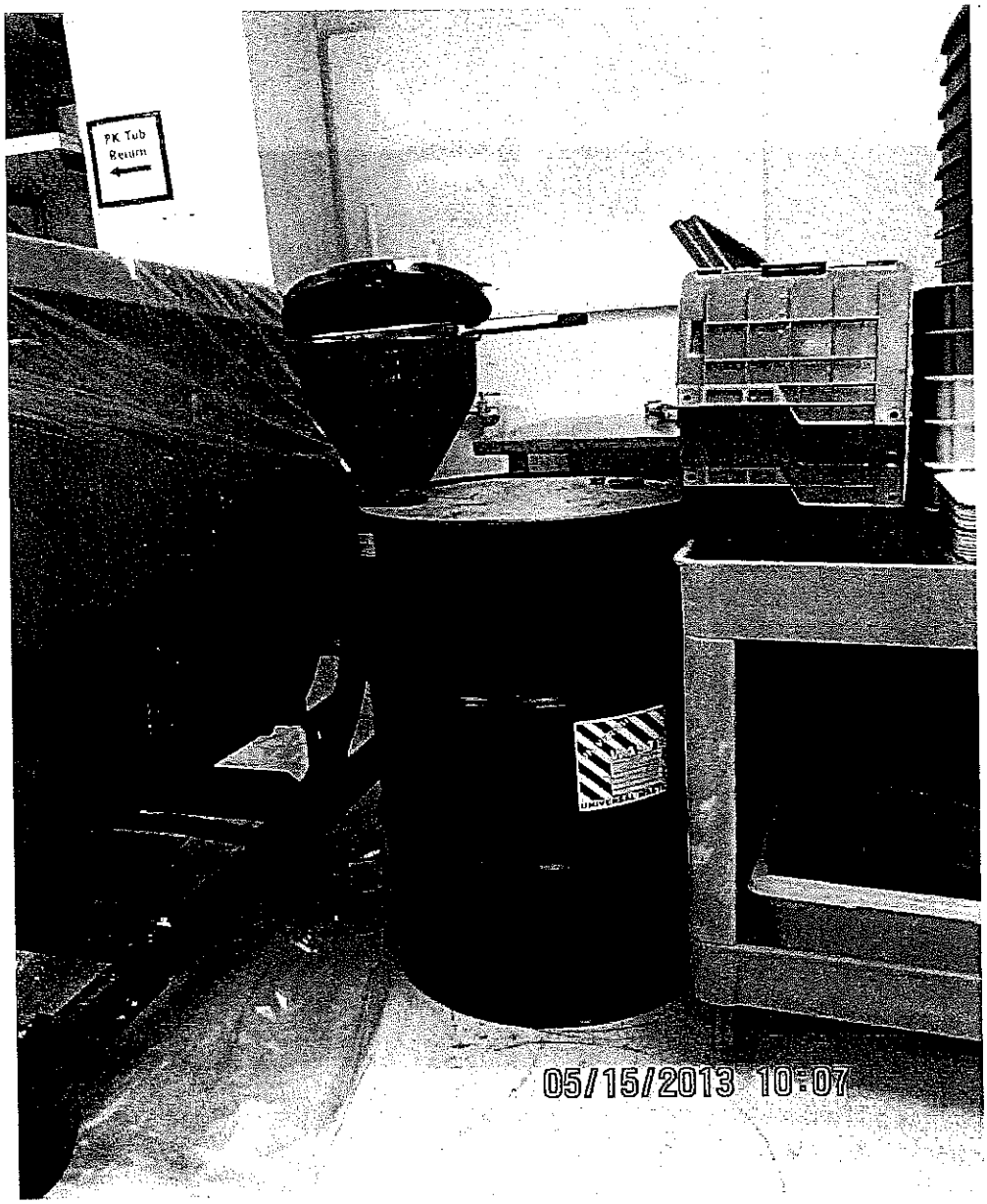

Photograph: #17
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Room M-2467 of the Test Material Control Area (TMC)
Description: Open 55-gallon drum marked as universal pharmaceutical liquid

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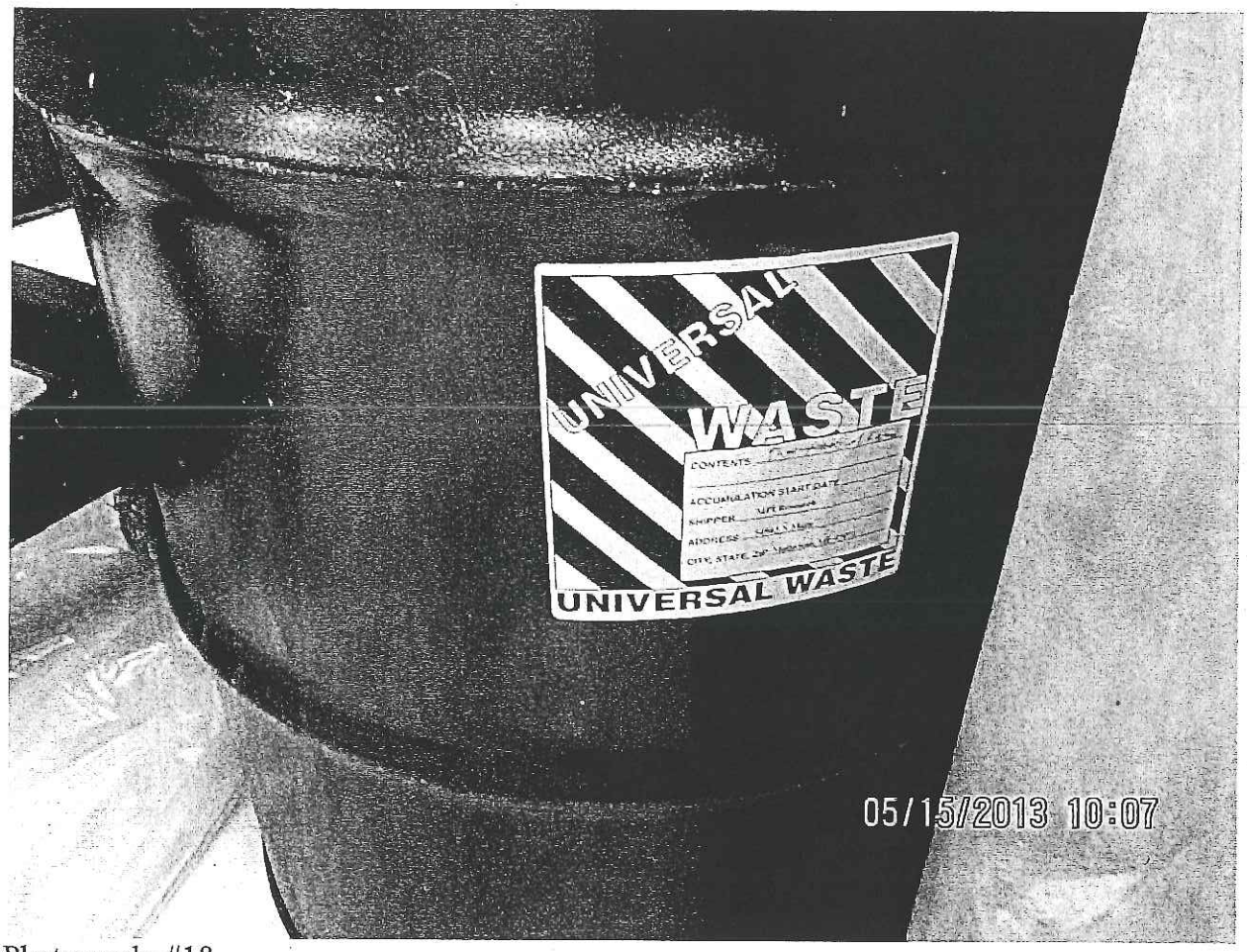

Photograph: #18
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Room M-2467 of the Test Material Control Area (TMC)
Description: A closer picture of the Open 55-gallon drum marked universal pharmaceutical liquid

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Photograph: #19
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Room M-2467 of the TMC
Description: Two 55-gallon drums marked as universal pharmaceutical solids were observed closed and not marked with the accumulation start date.

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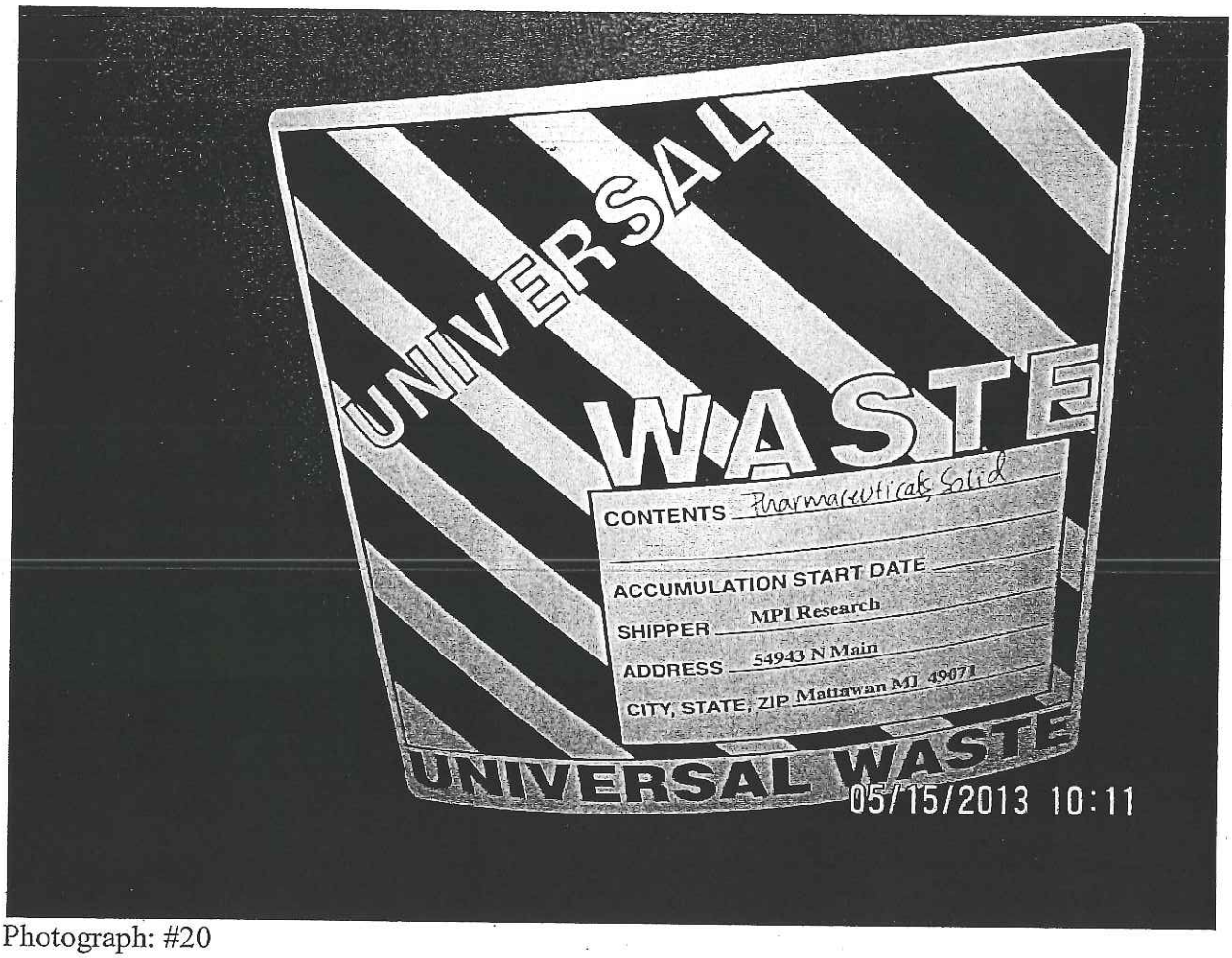

Photograph: #20
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Room M-2467 of the TMC
Description: A closer picture of a 55-gallon drum marked as universal pharmaceutical solid was observed closed without am accumulation start date.

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Photograph: #21
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Room M-2514
Description: Two 5-gallon containers observed not labeled as hazardous waste and not marked with hazardous waste codes.

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Photograph: #22
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Room M-2467
Description: Two 5-gallon containers labeled as hazardous waste and marked with hazardous waste codes at the time of the inspection.

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Photograph: #23
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Plastics Room F31
Description: Four 5-gallon containers were observed marked as hazardous waste and labeled with D001 hazardous waste codes, but not kept in good condition.

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Photograph: #24
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Plastics Room F31
Description: A closer picture of the 5-gallon container shown in photograph #23

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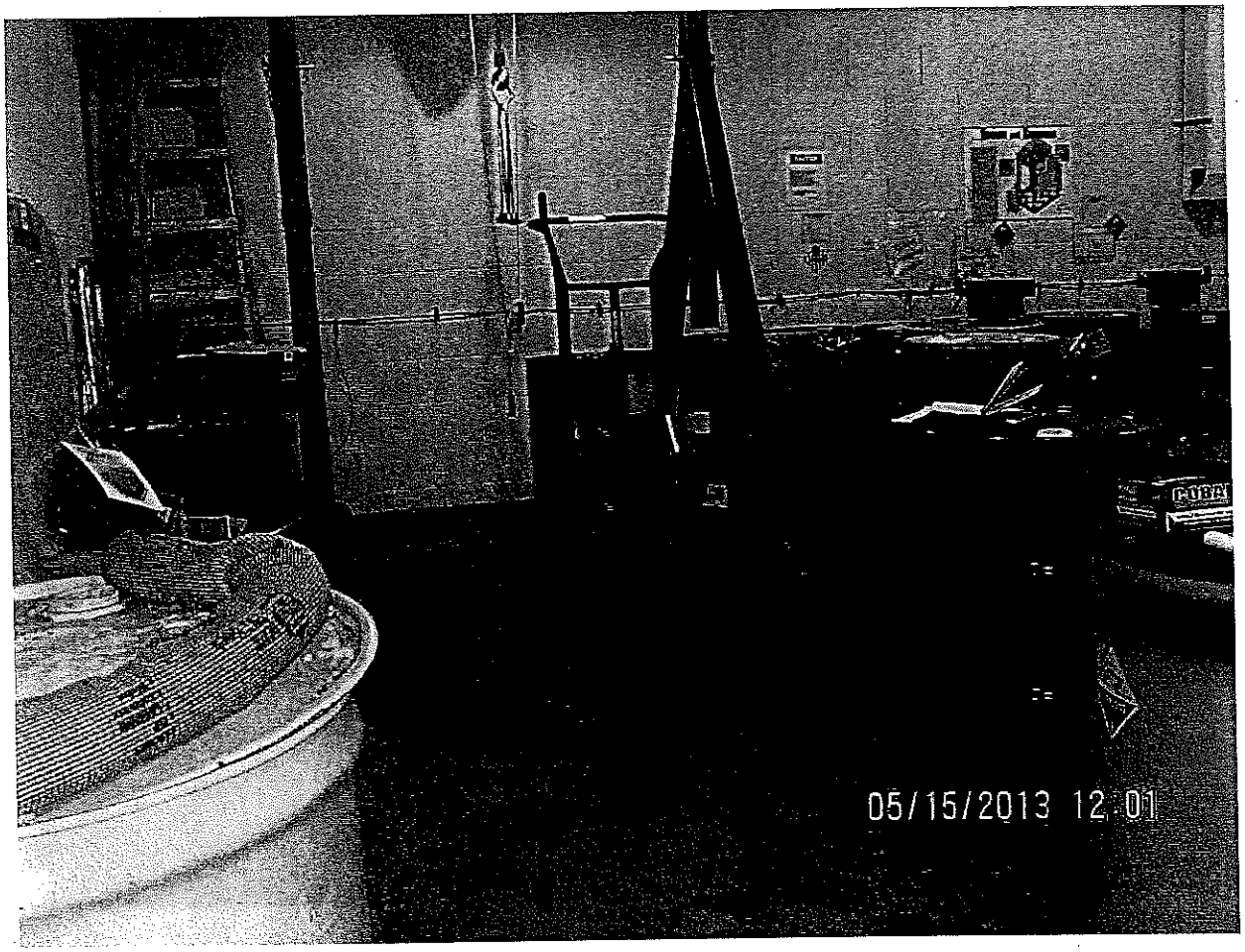

Photograph: #25
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Drum Room
Description: A picture of the Drum Room

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Photograph: #26
Name of Photographer: Inspector Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Drum Room
Description: Chemical product stored in the Drum Room

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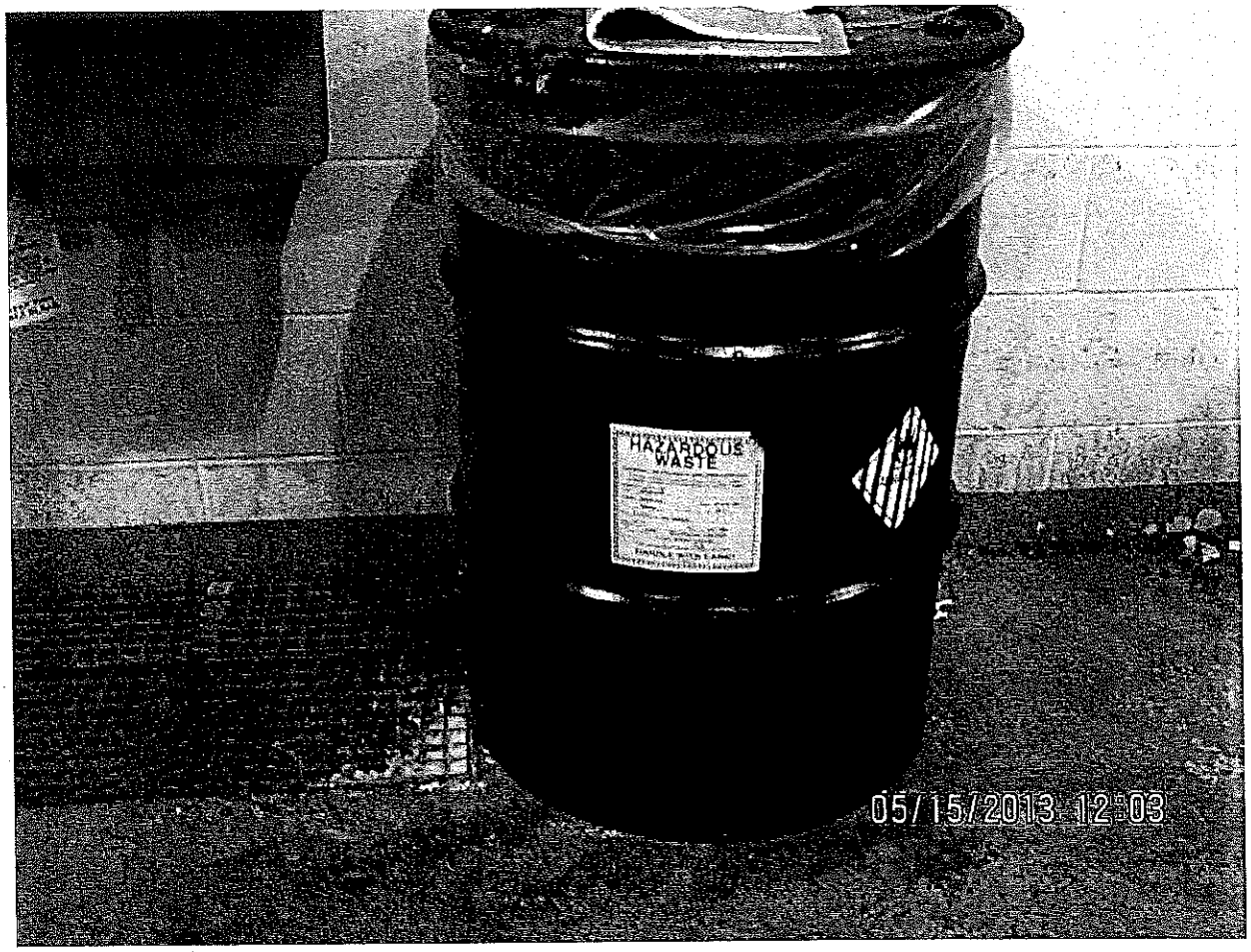

Photograph: #27
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Satellite Accumulation Area of the Drum Room
Description: A 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003.

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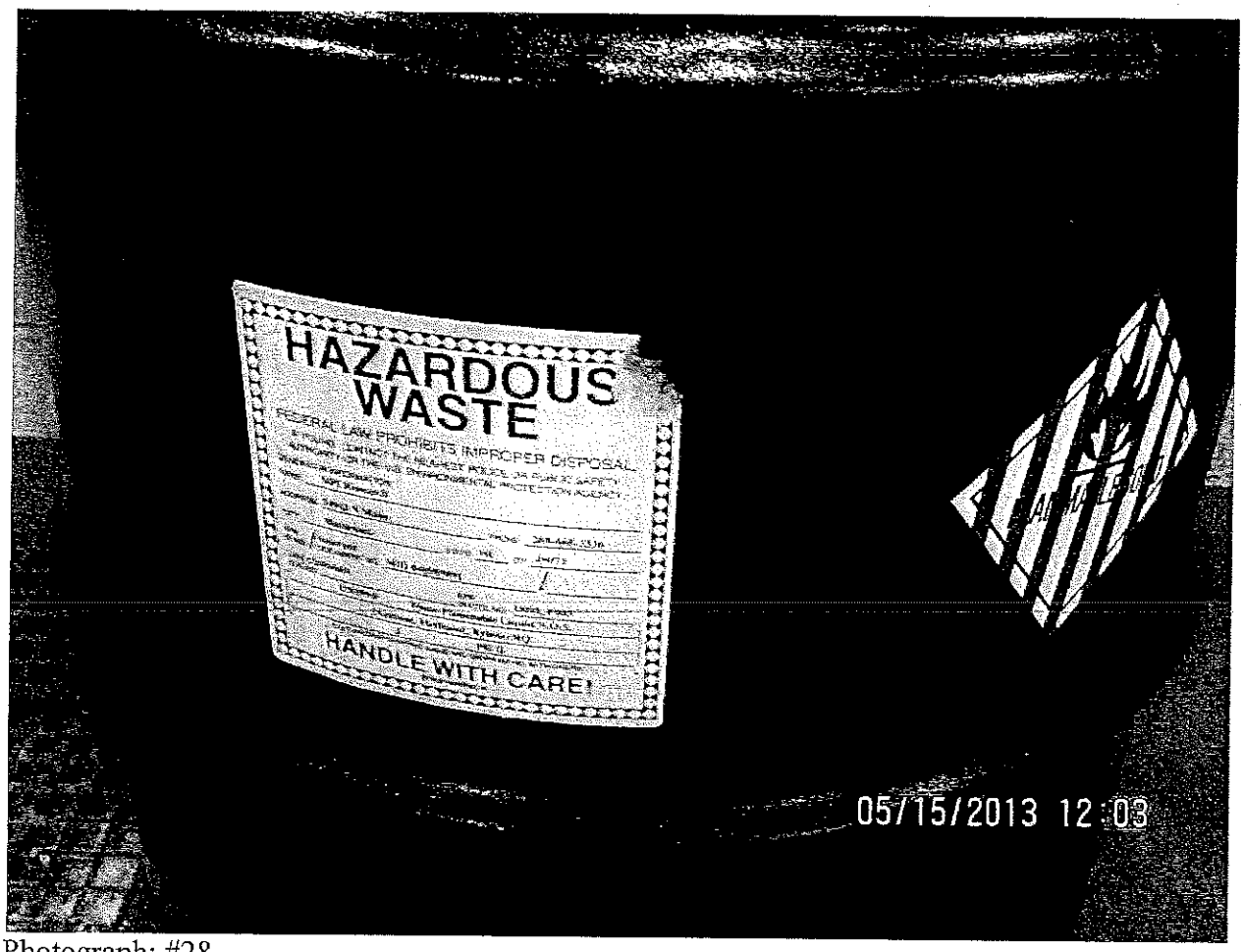

Photograph: #28
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 12, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Satellite Accumulation Area of the Drum Room
Description: A closer picture of the 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003.

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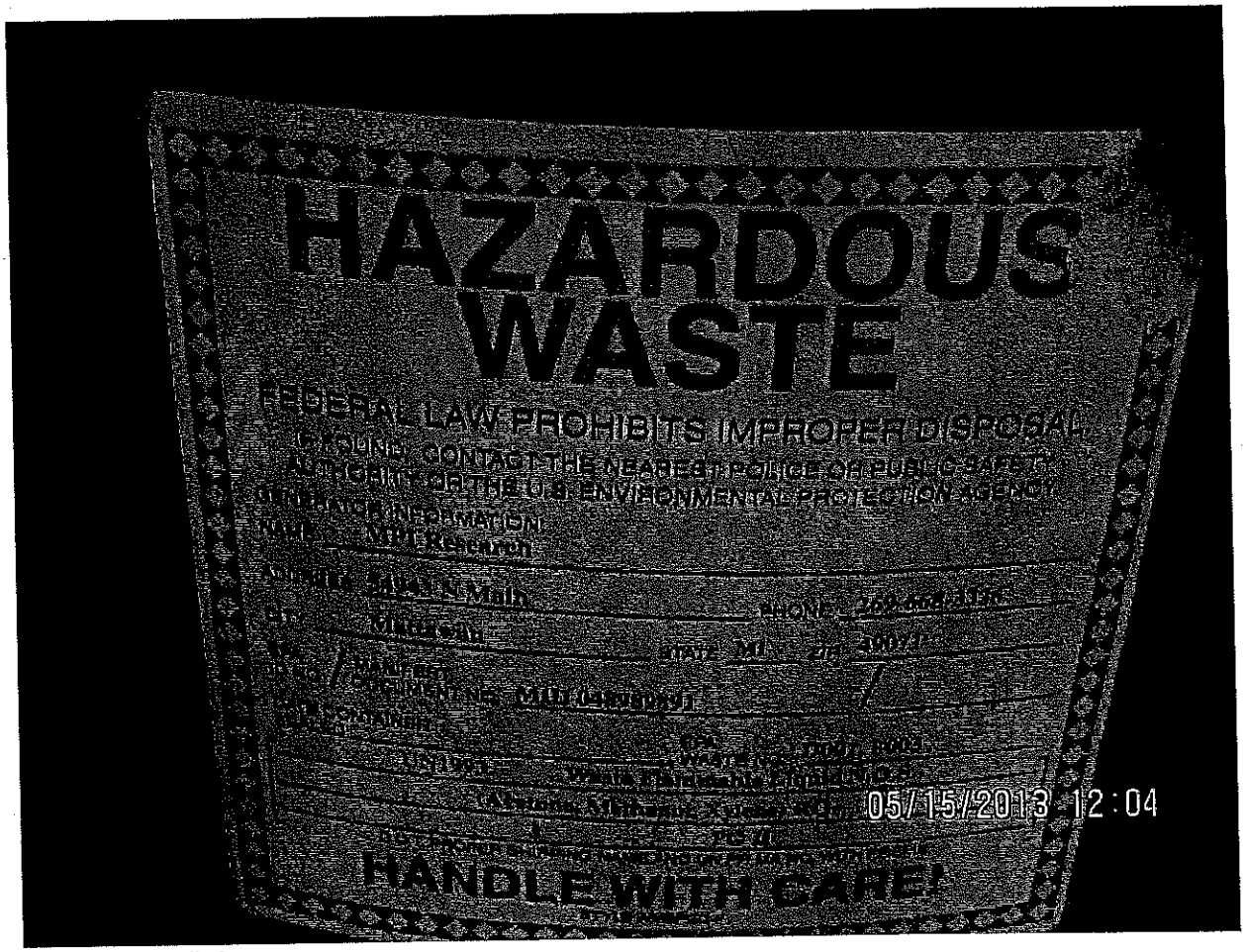

Photograph: #29
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Satellite Accumulation Area of the Drum Room
Description: A closer picture of the 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003.

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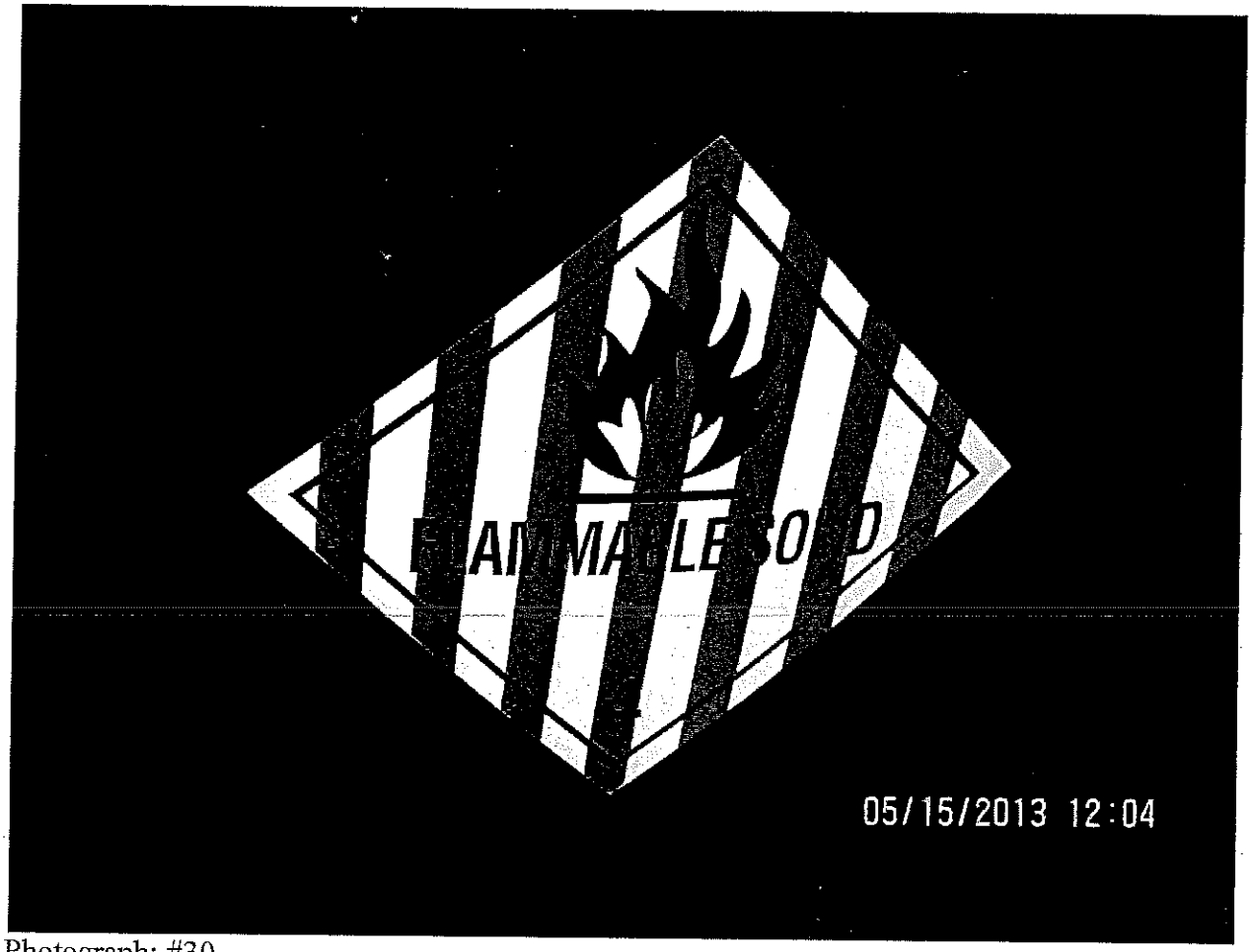

Photograph: #30
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Satellite Accumulation Area of the Drum Room
Description: A picture of the 55 gallon drum was observed in photographs#27, #28, and #29. The drum was marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003.

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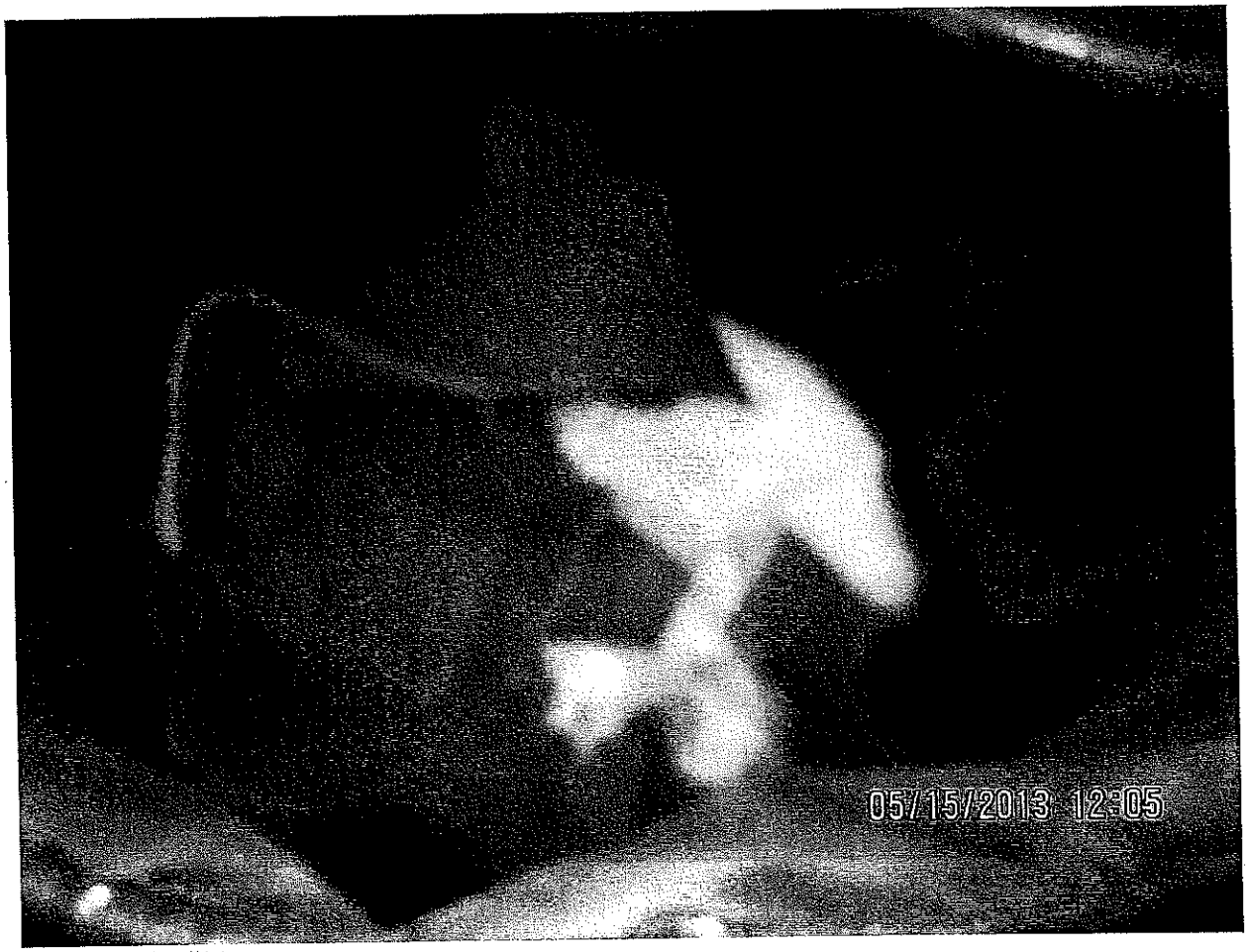

Photograph: #31
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Satellite Accumulation of the Drum Room
Description: A closer picture of the 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003.

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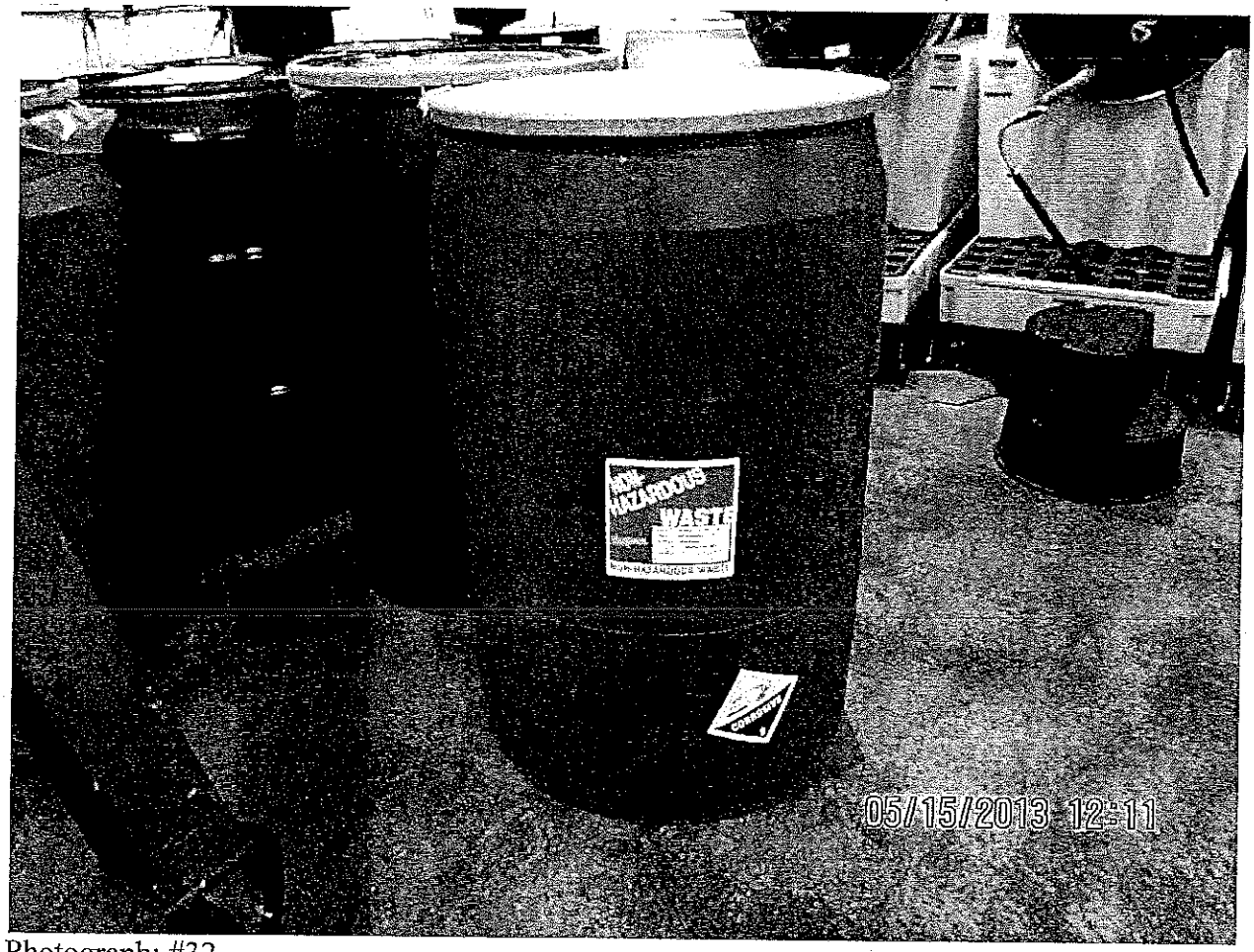

Photograph: #32
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Drum Room
Description: A 55 gallon drum was marked as non-hazardous waste containing formalin rags.

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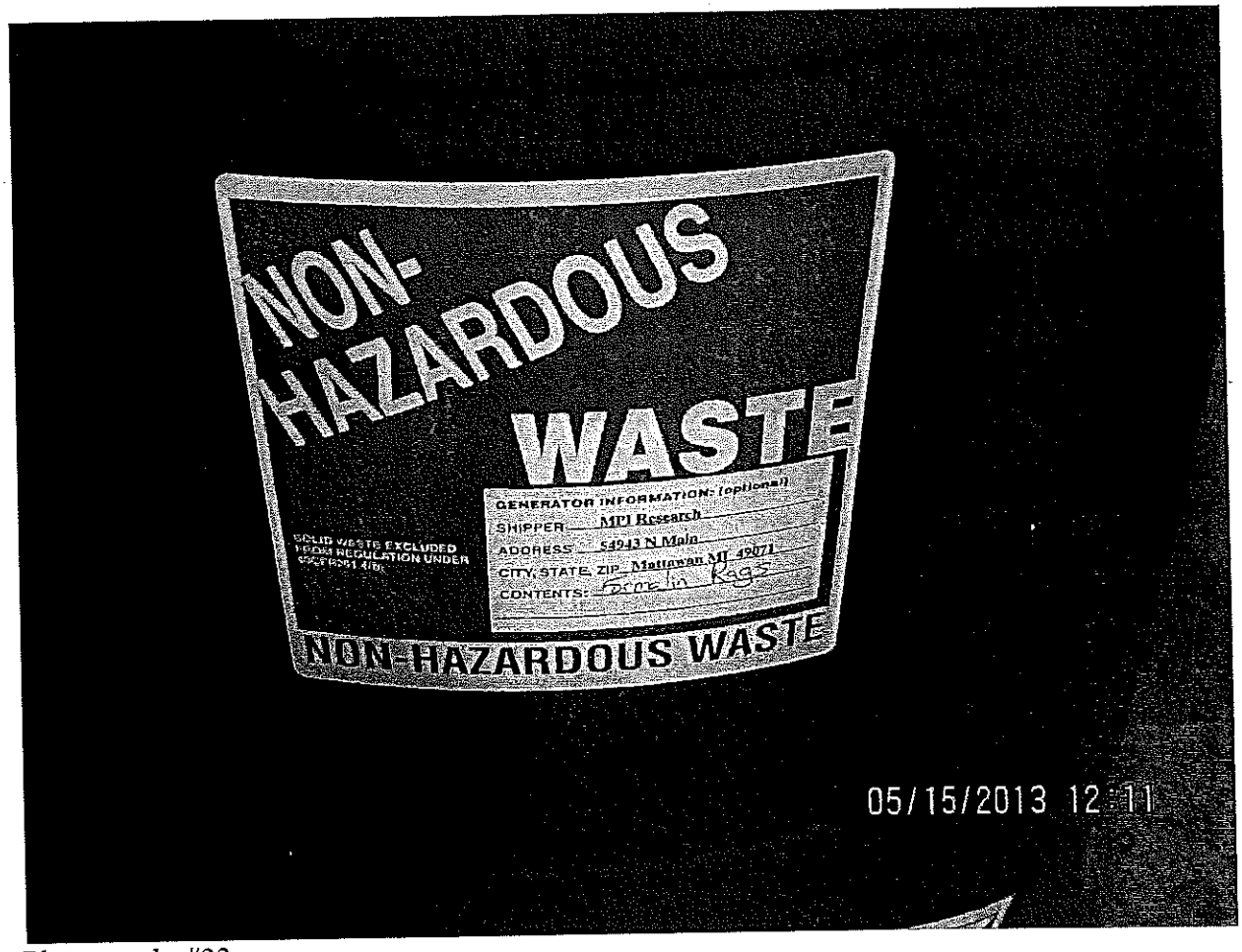

Photograph: #33
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Drum Room
Description: A closer picture of the non-hazardous waste label found in photograph #32

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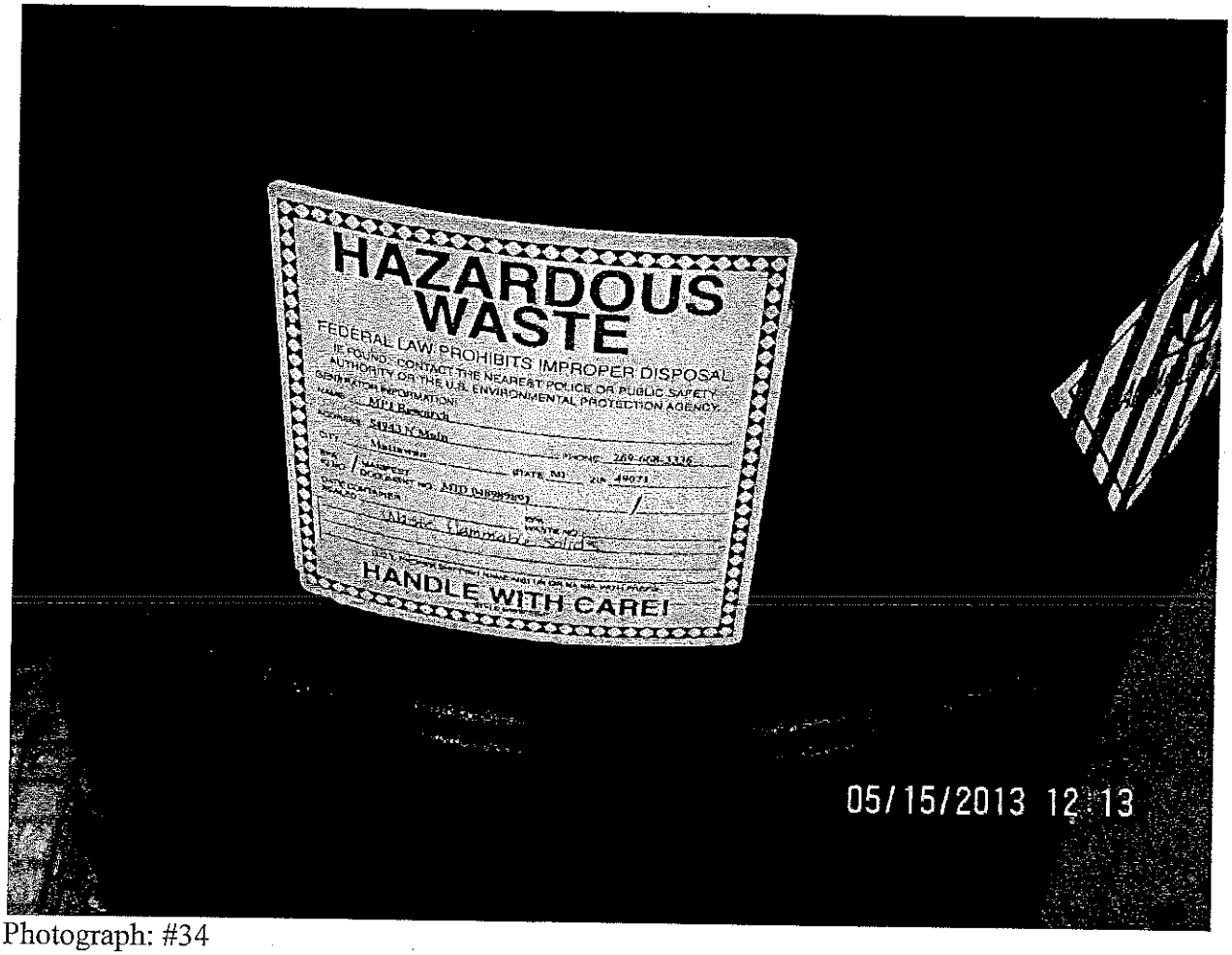

Photograph: #34
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: 90 Day Accumulation Area of the Drum Room
Description: A 55 gallon drum marked as hazardous waste flammable solids without accumulation start date.

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Photograph: #35
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: SAA of the Drum Room
Description: Top view of 55 gallon drum located in the Drum Room was observed labeled as a xylene/ paraffin waste and a flammable solid.

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Photograph: #36
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 12, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: SAA of the Drum Room
Description: 55 gallon drum located in the Drum Room was observed labeled as a xylene/ paraffin waste and a flammable solid.

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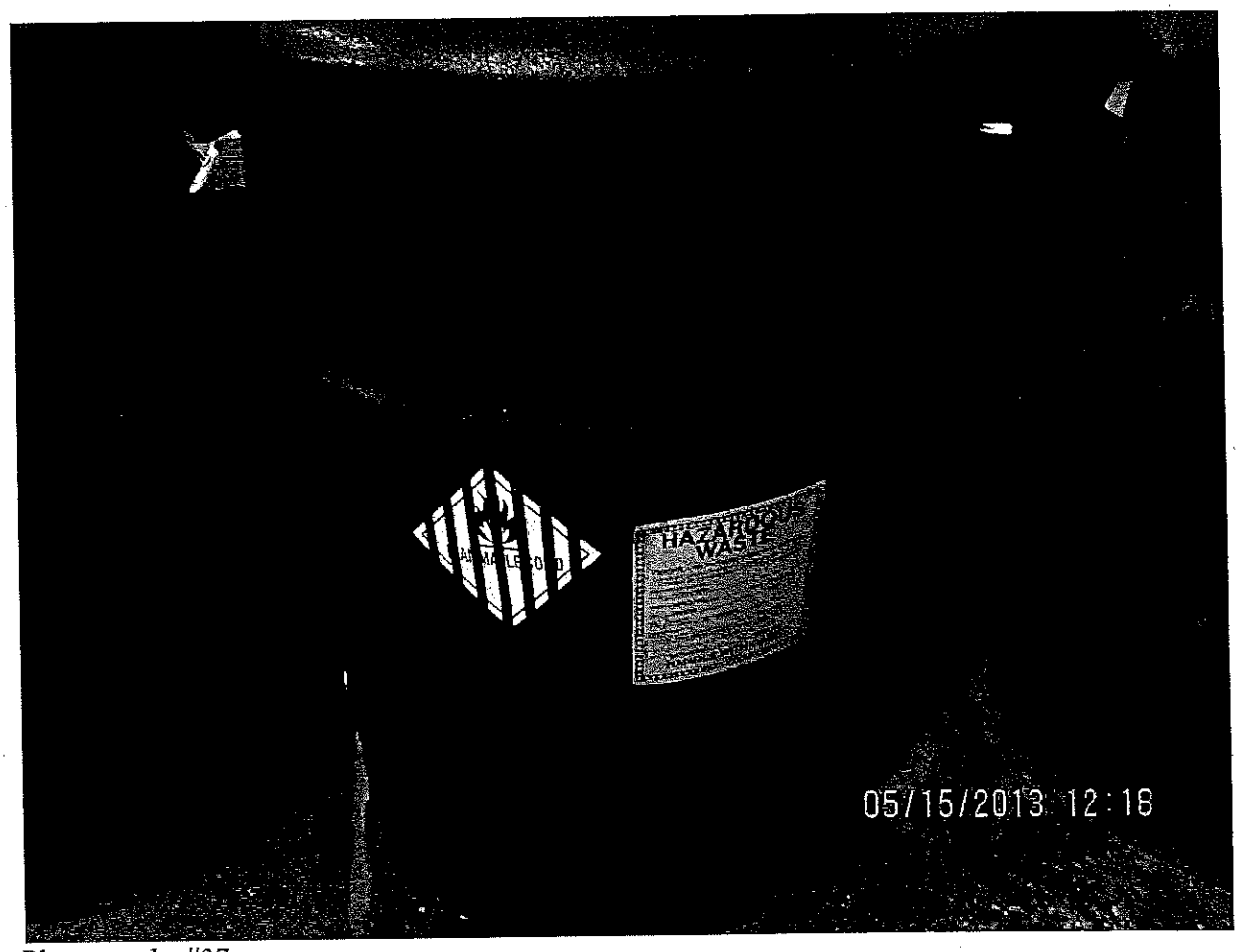

Photograph: #37
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: SAA of the Drum Room
Description: Hazardous waste label added to the 55 gallon drum in photograph #36 during the inspection.

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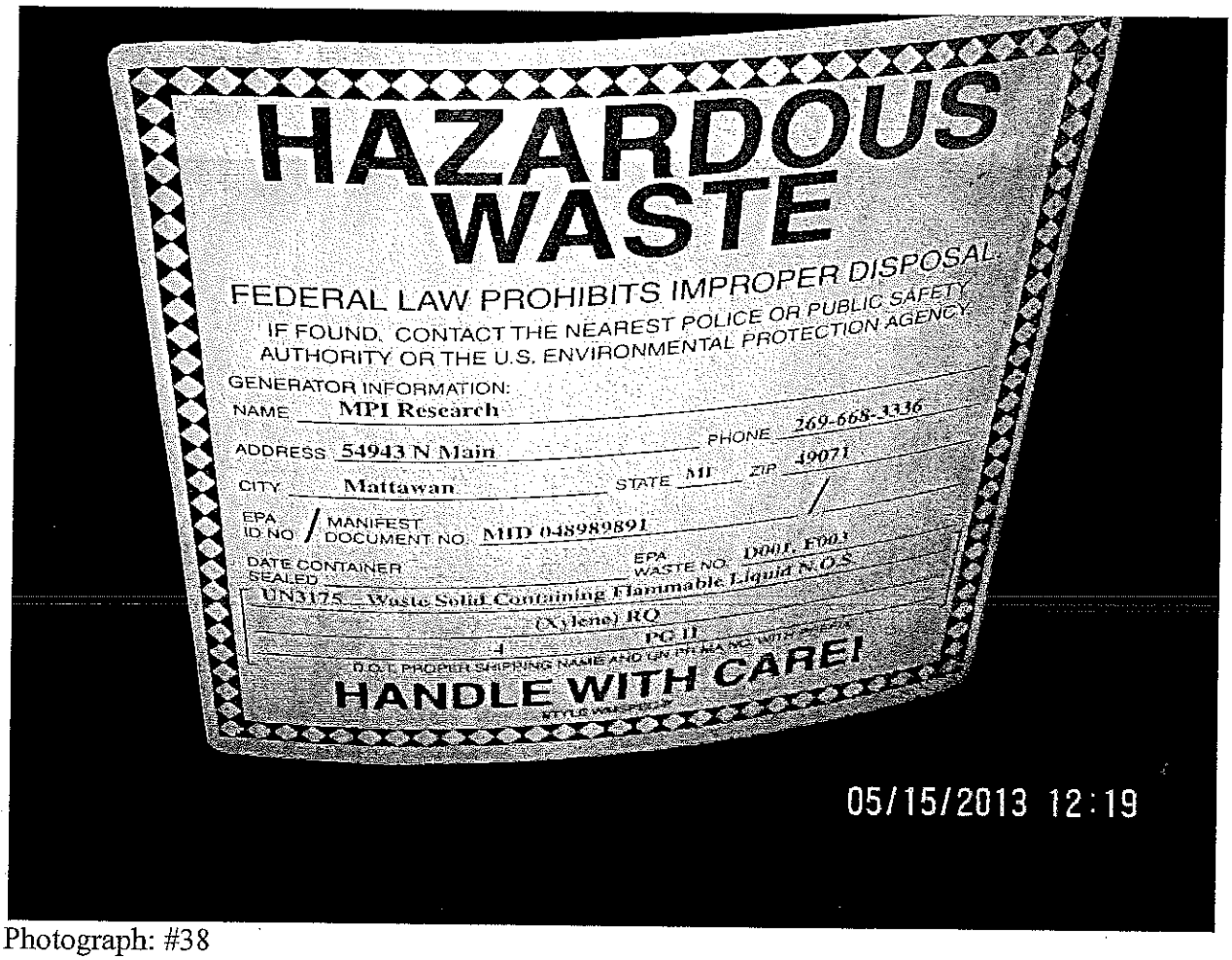

Photograph: #38
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: SAA of the Drum Room
Description: A closer picture of the hazardous waste label added to the 55 gallon drum in photograph#37 during the inspection.

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Photograph: #39
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: 90 Day Accumulation Area of the Drum Room
Description: Two 55 gallon drum observed not marked as hazardous waste with the hazardous waste codes.

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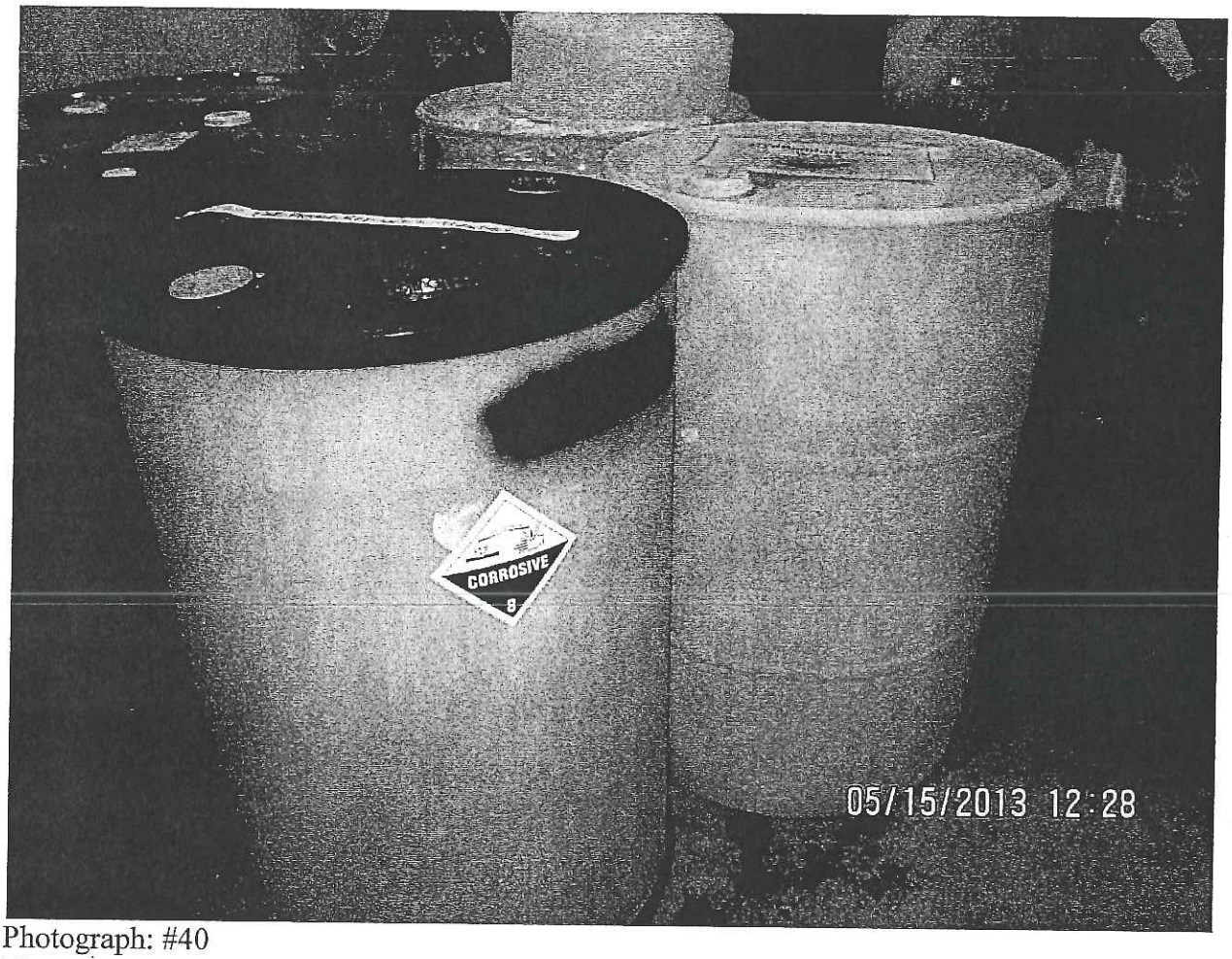

Photograph: #40
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: 90 Day Accumulation Area of the Drum Room
Description: Two 55 gallon drum not marked as hazardous waste with the hazardous waste codes.

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Photograph: #41
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: 90 Day Accumulation Area of the Drum Room
Description: Two 55 gallon drum not marked as hazardous waste with the hazardous waste codes.

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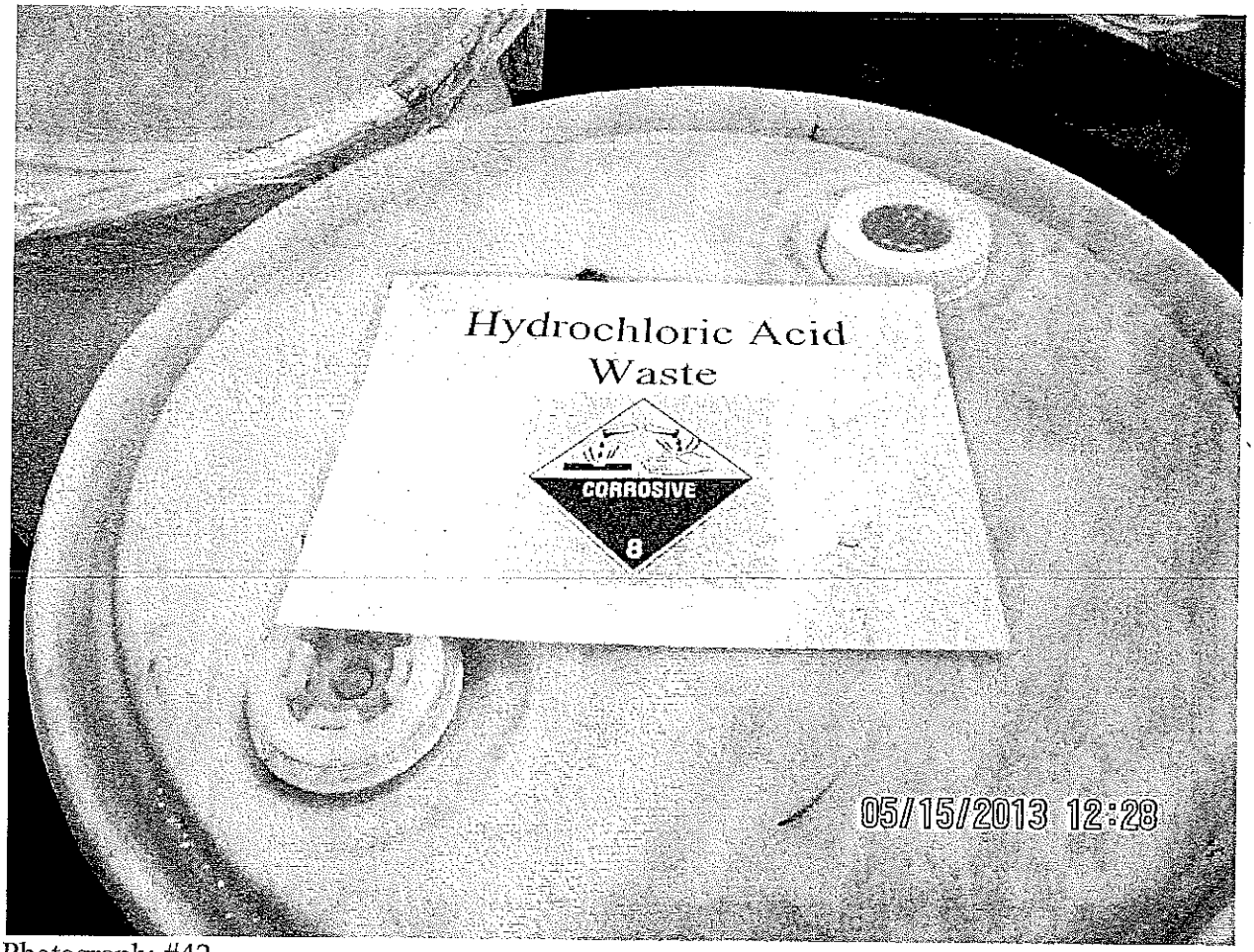

Photograph: #42
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: 90 Day Accumulation Area of the Drum Room
Description: Top view of one drum shown in photograph #41

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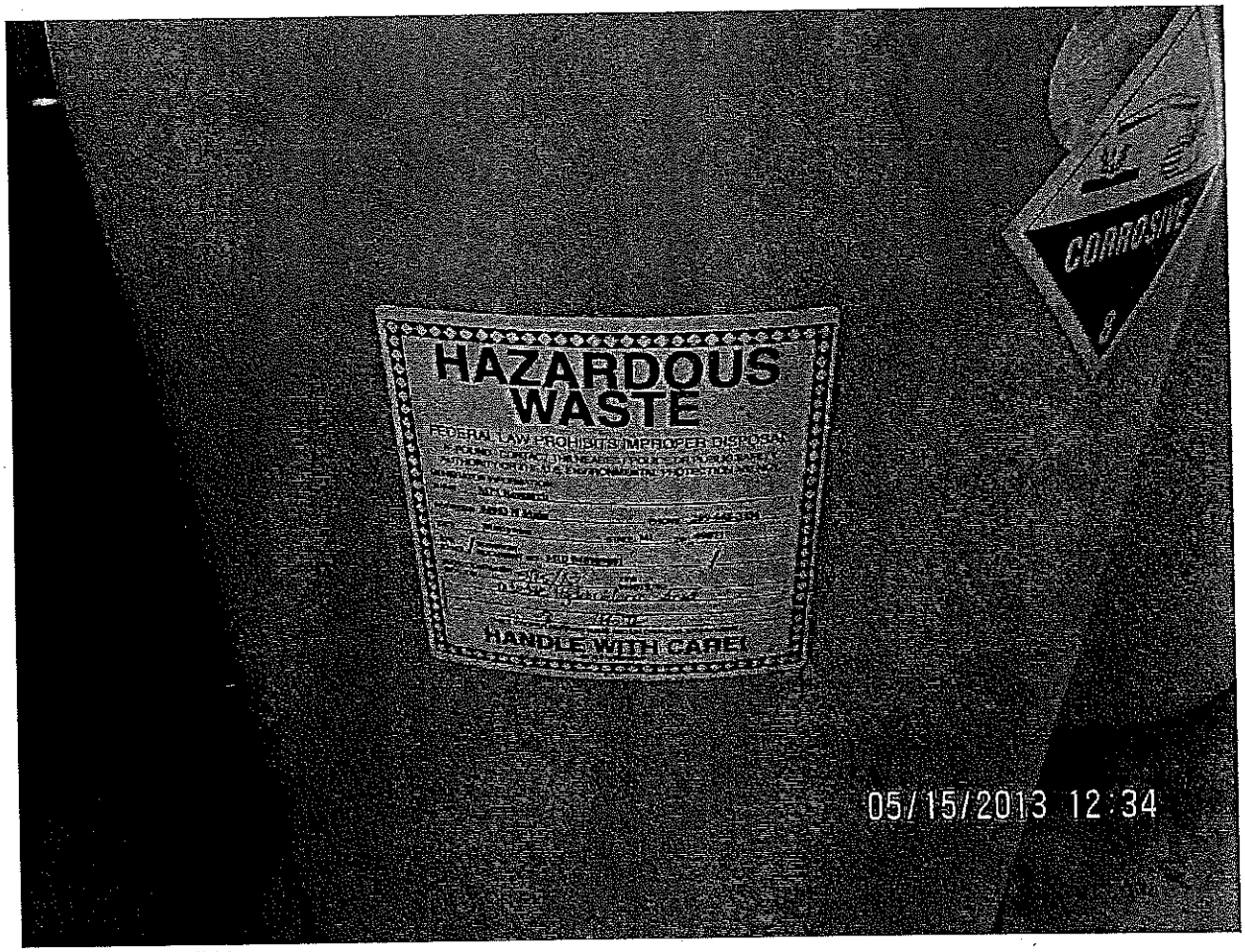

Photograph: #43
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: 90 Day Accumulation Area of the Drum Room
Description: Drum identified in photo#198 labeled as a waste hydrochloric acid without hazardous waste codes was placed on during the inspection.

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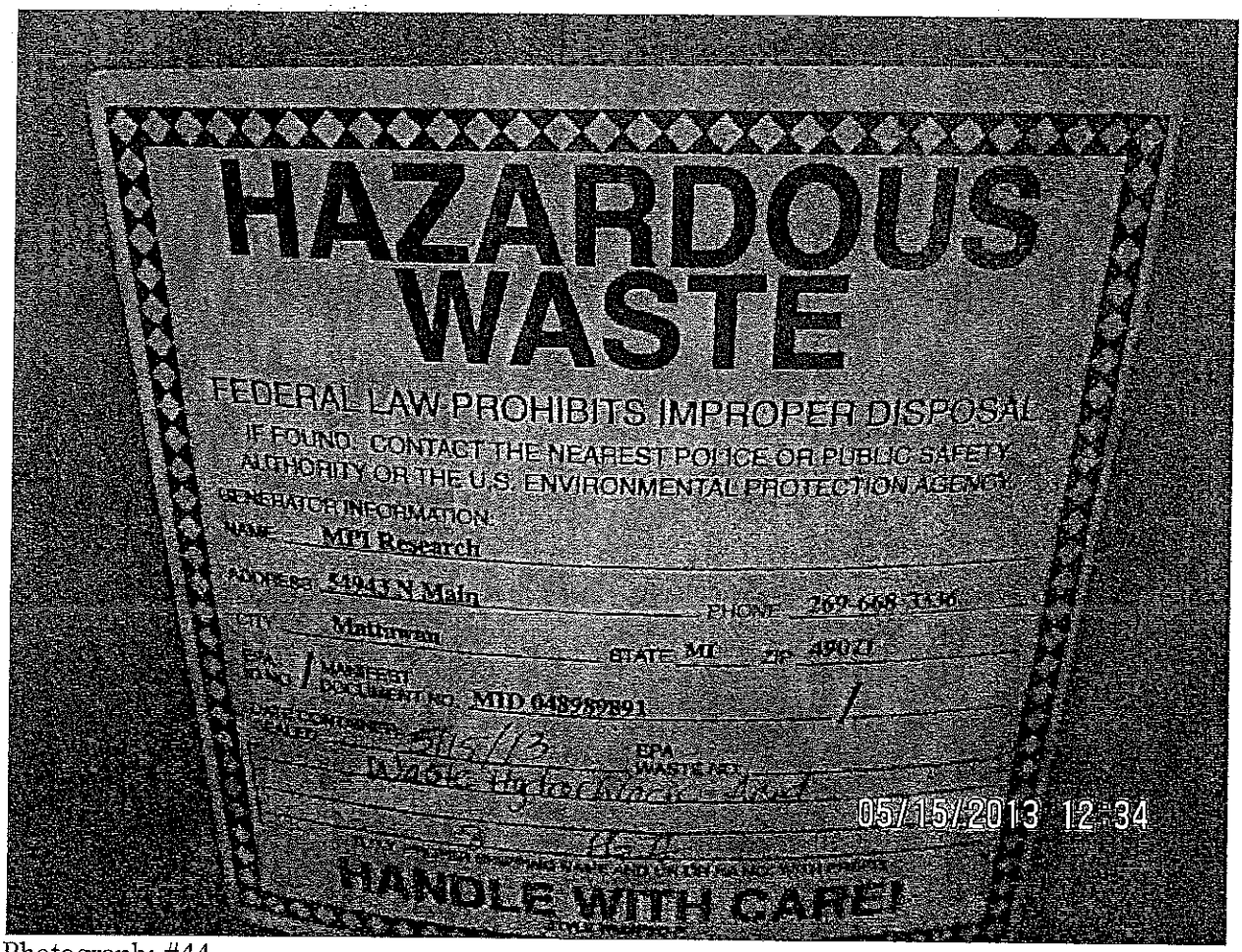
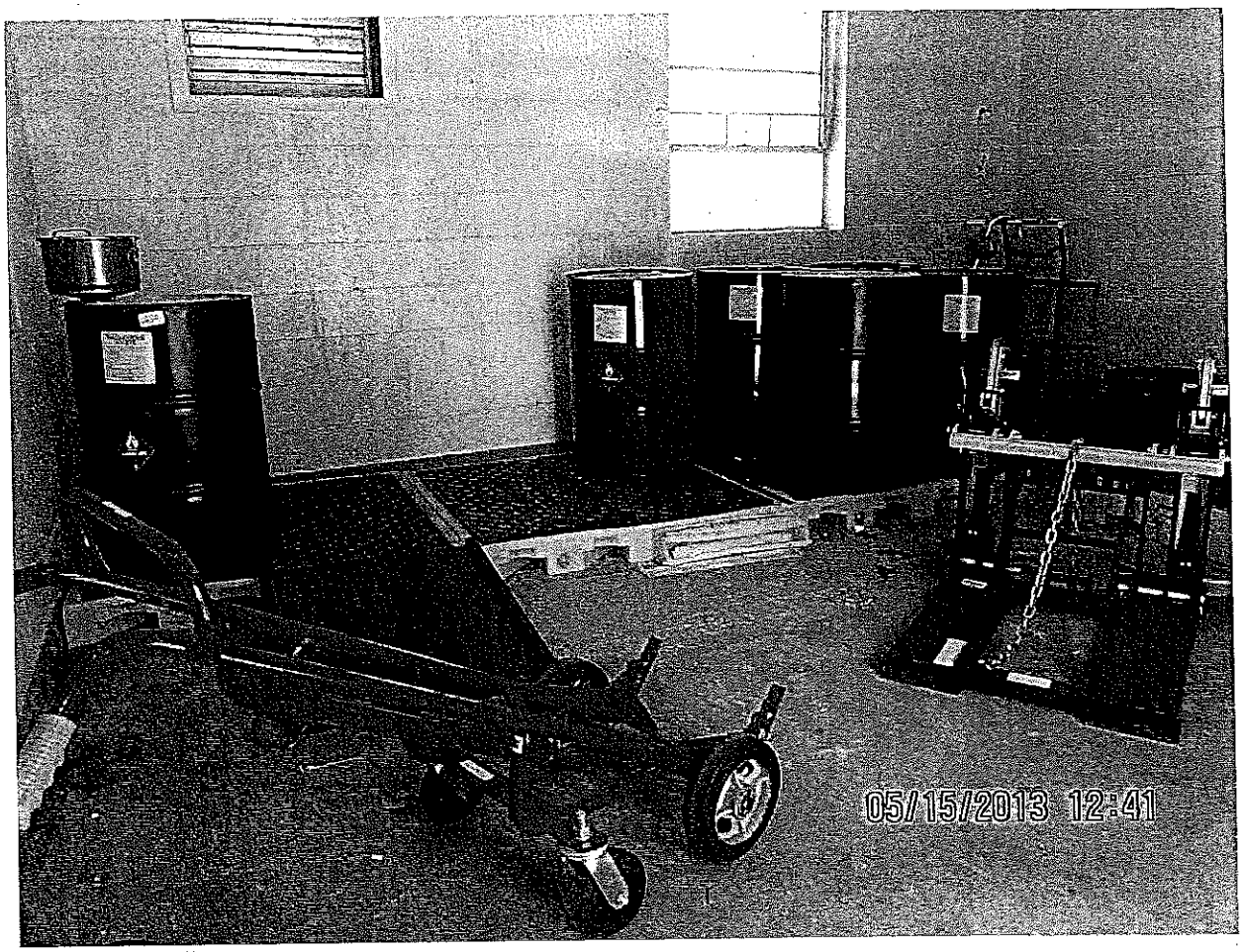


Photograph: #44
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 12, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: 90 Day Accumulation Area of the Drum Room
Description: Container marked with accumulation start date

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #45
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: 90 Day Accumulation Area of the Hazardous Waste Building
Description: Hazardous Waste Storage Area

Attachment A
Photographs for MPI RCRA CEI
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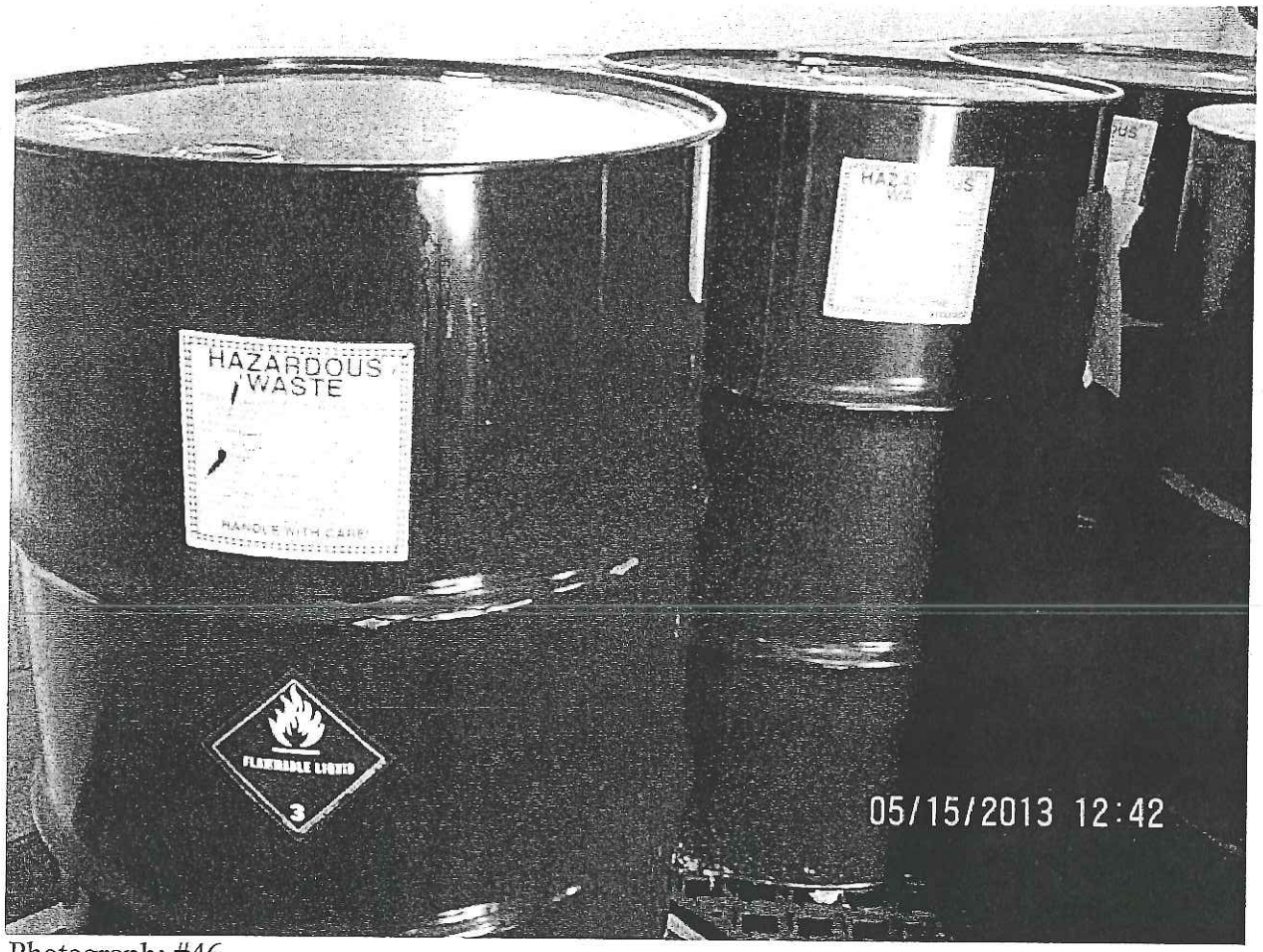
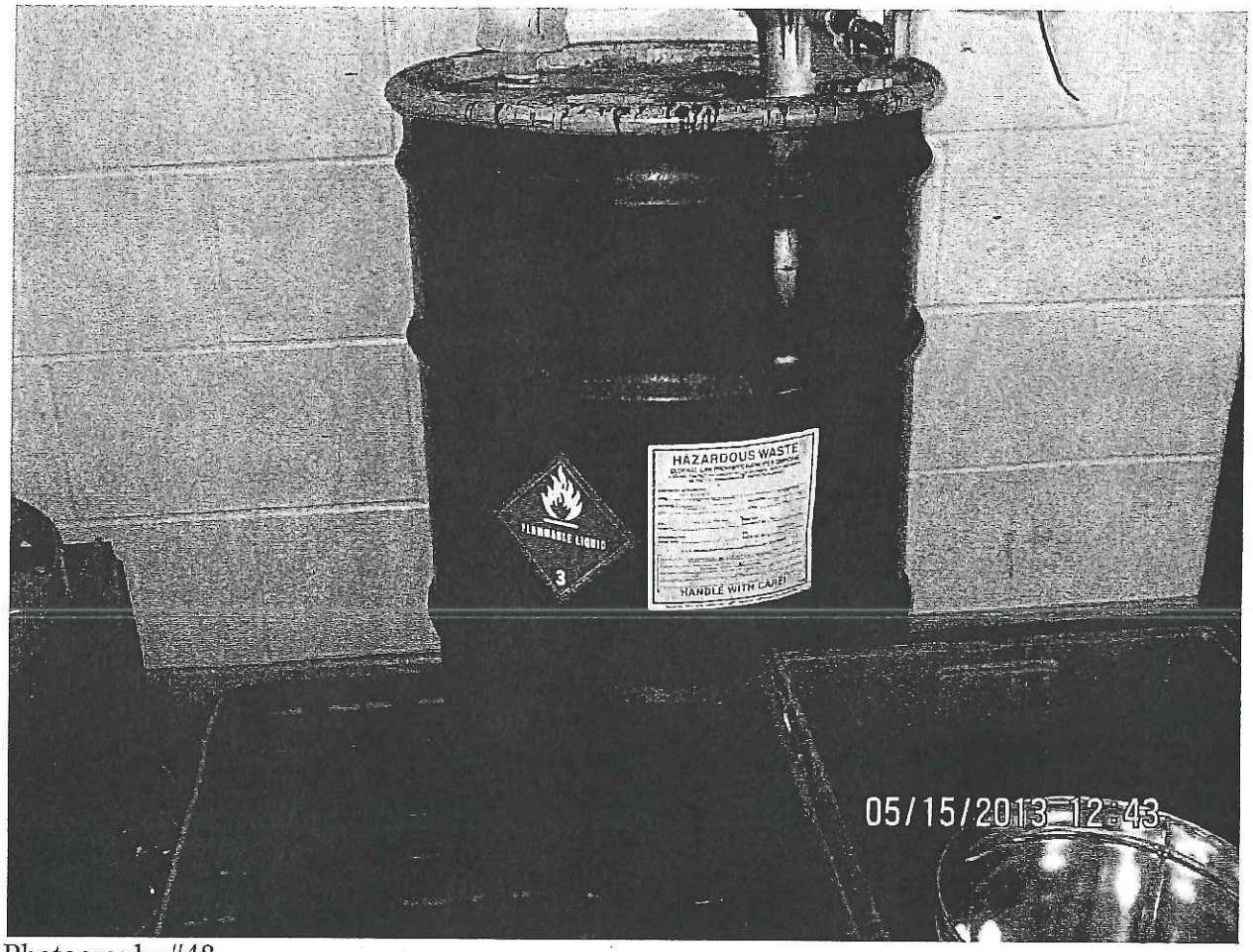


Photograph: #46
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: 90 Day Accumulation Area of the Hazardous Waste Building
Description: Several 55 gallon drums were observed marked as hazardous waste in the Hazardous Waste Storage Area

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013

Photograph: #47
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: 90 Day Accumulation Area of the Hazardous Waste Building
Description: Several 55 gallon drums were observed marked as hazardous waste in the Hazardous Waste Storage Area

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #48
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: SAA of the Hazardous Waste Building
Description: Container marked and labeled with the item of waste (acetone, xylene, methanol)

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013

Photograph: #49
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: 90 Day Accumulation Area of the Hazardous Waste Building
Description: Container not marked and labeled with contents of waste (hydrochloric acid)

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013

Photograph: #50
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: 90 Day Accumulation Area of the Hazardous Waste Building
Description: Container marked and labeled at the time of the inspection

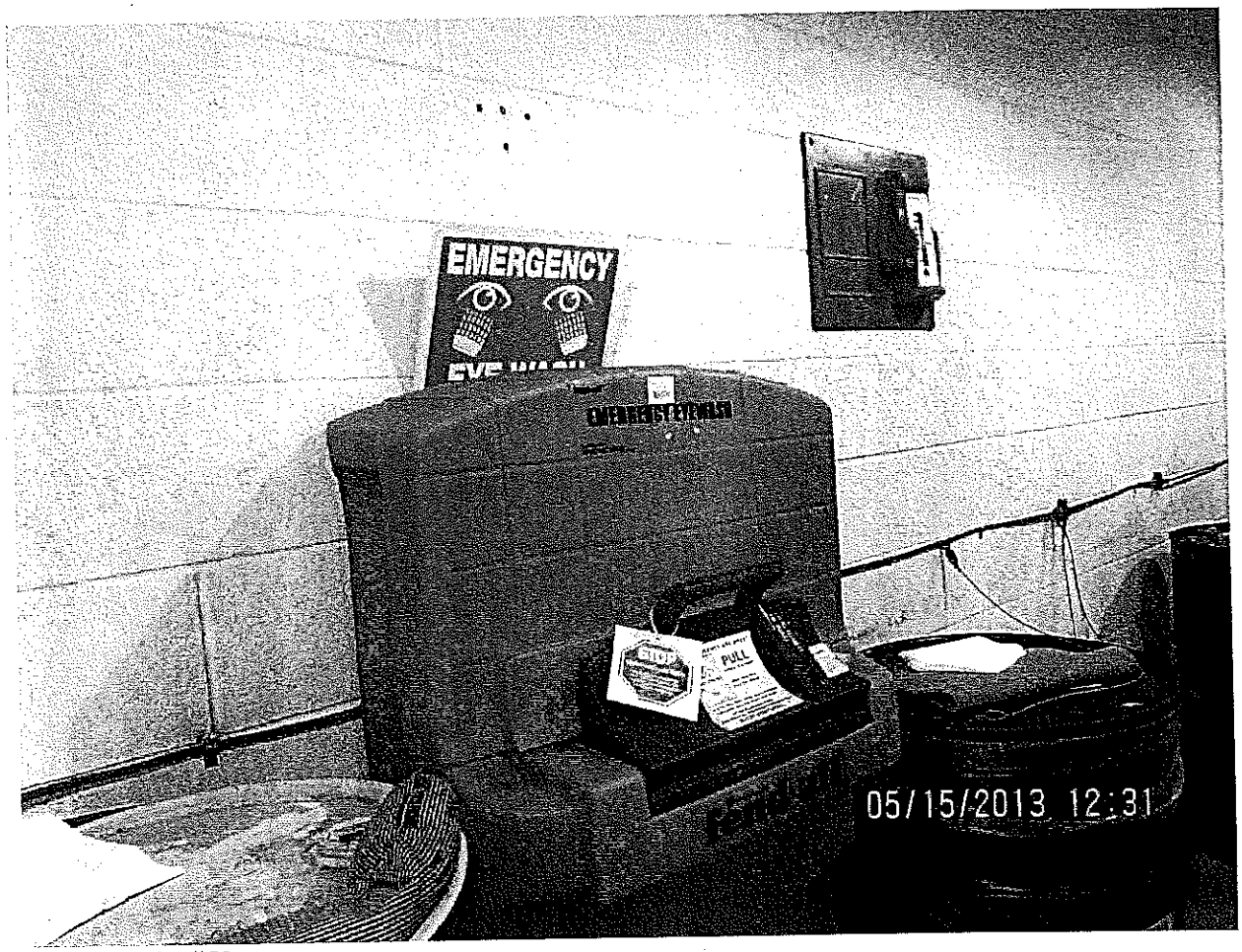
Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013

Photograph: #51
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Hazardous Waste Building
Description: Container not marked and labeled as universal waste lamps

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013

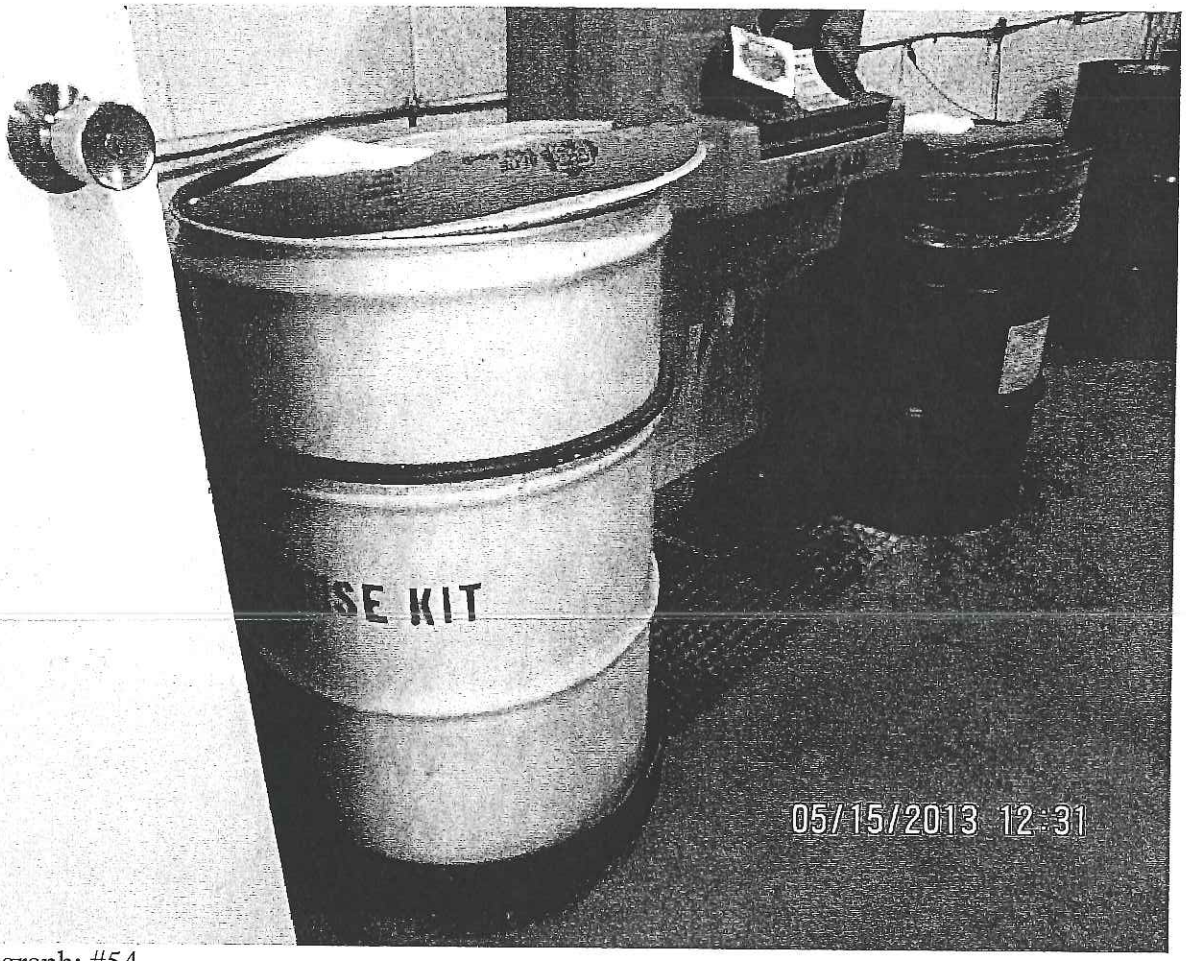
Photograph: #52
Name of Photographer: Cindy Dabner
Date/Time of Photograph: May 15, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Hazardous Waste Building
Description: Universal waste marked and labeled at time of inspection

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #53
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 12, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Drum Room
Description: Picture of emergency equipment

Attachment A
Photographs for MPI RCRA CEI
MID 048 989 891
May 15, 2013



Photograph: #54
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 12, 2013
Site Location: 54943 North Main Street, Mattawan, MI 49071
Photograph Location: Drum Room
Description: Picture of emergency response

ATTACHMENT B

MPI Photograph Log

MID 048 989 891

Attachment B- MPI Research MID 048 989 891 Photograph Log

Photographer: US EPA Inspector Cindy Dabner

Location: 54943 North Main Street, Mattawan, MI 49071

Date(s): May 15, 2013

Photo #	Description	Date
1	Photograph of the facility sign	May 15, 2013
2	A 55 gallon container containing test articles waste (acetone, methanol, xylene - D001, F003) located in the Analytical Area	May 15, 2013
3	A closer picture of the label of the 55 gallon container containing test articles waste (acetone, methanol, xylene - D001, F003) located in the Analytical Area	May 15, 2013
4	A picture of the room M-2116 sign where hazardous waste is stored in 5 gallon containers	May 15, 2013
5	A picture of the hazardous waste contained in containers ranging in various sizes in Room M-2116	May 15, 2013
6	A tray located on the floor of the Analytical Area holding 5 gallon containers labeled as "mixed organic waste."	May 15, 2013
7	A 55 gallon drum marked with waste codes D001 and F003 and labeled as acetone, methanol, and xylene.	May 15, 2013
8	A closer picture of the label on the 55 gallon drum marked with waste codes D001 and F003 and labeled as acetone, methanol, and xylene.	May 15, 2013
9	Description: A picture of the test article trays contained in photograph	May 15, 2013
10	A 55 gallon drum of non-hazardous universal pharmaceutical waste marked as TOMTEC Tips Lab Waste.	May 15, 2013
11	A closer picture of the label of the 55 gallon drum labeled as non-hazardous universal pharmaceutical waste and marked as TOMTEC Tips Lab Waste.	May 15, 2013
12	A picture of the contents of 55 gallon drum of non-hazardous universal pharmaceutical waste marked as TOMTEC Tips Lab Waste.	May 15, 2013
13	A container was observed in room M-2514 marked as hazardous waste with D001 waste code	May 15, 2013
14	A closer picture of the 5 gallon container observed in room M-2514 marked as hazardous waste with D001 waste code.	May 15, 2013
15	Non-hazardous waste with contents marked as TOMTEC Tips in room M2467	May 15, 2013
16	A closer picture of the label of the 55 gallon drum marked as Non-hazardous waste with contents marked as TOMTEC Tips room M-2467	May 15, 2013

Photo #	Description	Date
17	Open 55 gallon drum marked universal pharmaceutical liquid in room M-2467	May 15, 2013
18	A closer picture of the Open 55 gallon drum marked universal pharmaceutical liquid	May 15, 2013
19	Two 55 gallon drums marked as universal pharmaceutical solids were observed closed in room M-2467	May 15, 2013
20	A closer picture of a 55 gallon drum marked as universal pharmaceutical solid was observed closed in room M-2467 of TMC	May 15, 2013
21	Two 5 gallon containers observed not labeled as hazardous waste and not marked with hazardous waste codes in room M-2514	May 15, 2013
22	Two 5 gallon containers observed not labeled as hazardous waste and not marked with hazardous waste codes in room M-2467	May 15, 2013
23	Four 5 gallon containers were observed marked as hazardous waste and labeled with D001 hazardous waste codes Plastics Rm F31	May 15, 2013
24	A closer picture of the 5 gallon container shown in photograph#23	May 15, 2013
25	A picture of the Drum Room	May 15, 2013
26	Chemical product stored in the Drum Room	May 15, 2013
27	A 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003 in the Drum Room	May 15, 2013
28	A closer picture of the 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003.	May 15, 2013
29	A closer picture of the 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003 of the SSA of the Drum Room	May 15, 2013
30	A closer picture of the 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003	May 15, 2013
31	A closer picture of the 55 gallon drum was observed marked as hazardous waste (acetone, methanol, and xylene) and hazardous was codes D001 and F003 in the Drum Room	May 15, 2013
32	A 55 gallon drum was marked as non-hazardous waste containing formalin rags	May 15, 2013
33	A closer picture of the non-hazardous waste label taken in photograph #32	
34	A 55 gallon drum marked as hazardous waste flammable solids without accumulation start date	May 15, 2013
35	Top view of 55 gallon drum located in the Drum Room was observed labeled as a xylene/ paraffin waste and a flammable solid	May 15, 2013
36	55 gallon drum located in the Drum Room was observed labeled as a xylene/ paraffin waste and a flammable solid.	May 15, 2013
37	Hazardous waste label added to the 55 gallon drum in photo#193	May 15, 2013

Photo #	Description	Date
	during the inspection.	
38	A closer picture of the hazardous waste label added to the 55 gallon drum in photo#193 during the inspection.	May 15, 2013
39	Two 55 gallon drum observed not marked as hazardous waste with the hazardous waste codes.	May 15, 2013
40	Two 55 gallon drum not marked as hazardous waste with the hazardous waste codes.	May 15, 2013
41	Two 55 gallon drum not marked as hazardous waste with the hazardous waste codes.	May 15, 2013
42	Top view of one drum shown in photo# 197	May 15, 2013
43	Drum identified in photo#198 labeled as a waste hydrochloric acid without hazardous waste codes was placed on during the inspection.	May 15, 2013
44	Container marked with accumulation start date	May 15, 2013
45	Hazardous Waste Storage Area	May 15, 2013
46	Several 55 gallon drums were observed marked as hazardous waste in the Hazardous Waste Storage Area	May 15, 2013
47	Several 55 gallon drums were observed marked as hazardous waste in the Hazardous Waste Storage Area	May 15, 2013
48	Container marked and labeled with the item of waste (acetone, xylene, methanol)	May 15, 2013
49	Container not marked and labeled with contents of waste (hydrochloric acid)	May 15, 2013
50	Container marked and labeled at the time of the inspection	May 15, 2013
51	Container not marked and labeled as universal waste lamps	May 15, 2013
52	Universal waste marked and labeled at time of inspection	May 15, 2013
53	Picture of emergency equipment	May 15, 2013
54	Picture of emergency response kit	May 15, 2013

ATTACHMENT C

DMEQ Fully Regulated Generator Inspection Checklist

MPI MID 048 989 891

Department of Environmental Quality
FULLY REGULATED GENERATOR (FRG) INSPECTION FORM

Facility's Name MPI Research Part 3 Rules

Date May 15, 2013 ID# MID 048 989 891 1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH
Hydrochloric Acid D002	Production Process Waste	
Spent Lab Solvents F003 D001	Laboratory Waste	
Formaldehyde D001, D002	Laboratory Waste	

___ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

WASTE DETERMINATION (Rule 302: 40 CFR 262.11

(NI = Not inspected; N/A = Not applicable)

		YES	NO	
1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11))	262A	[✓]	___	NI N/A
a) copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c))	262D	[ ]	___	NI N/A
b) re-evaluated waste when changes in materials or process? (Rule 302(3))	262A	[ ]	___	NI N/A
2. Did generator have written waste analysis plan if treating wastes on-site? (Rule 306)(1)(d):40 CFR 268.7(a)(5))	262C	[ ]	___	NI N/A
IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)				
3. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)	262A	[ ]	___	NI N/A
MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)				
4. Copies of the manifest readily available for review & inspection? (Section 11138(1)(f))	FSS	[✓]	___	NI N/A
5. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.20(a))	262D	[ ]	___	NI N/A
6. Manifests, prepared by the generator according to instructions in appendix of Part 262 contain the following:				
a) manifest document number (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[ ]	___	NI N/A
b) generator's name, address, phone & ID # (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[ ]	___	NI N/A
c) name & ID # of the transporter. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[ ]	___	NI N/A
d) name, address & ID # of TSDF. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[ ]	___	NI N/A
e) DOT description of waste(s). (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[ ]	___	NI N/A
f) quantity of waste, type & # of containers. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[ ]	___	NI N/A
g) hazardous waste number of the wastes. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[ ]	___	NI N/A
h) generator signature, initial transporter & date of acceptance. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	[ ]	___	NI N/A
7. **NOT APPLICABLE**				
8. For out-of-state manifests, if not submitted by designated facility, generator submitted copy of 3rd signature manifest as requested by Director? (Rule 304(2)(c))	262B	[ ]	___	NI N/A
9. Is the transporter used properly registered &/or permitted under Act 138, Sec. 2 (3)? (Rule 304(1)(c))	262B	[ ]	___	NI N/A

NOTE: *For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(g or h).*

10. Using manifest that has expired? (Rule 304(1)(a) : 40 CFR 262.20)	262B	___	[ ]	NI N/A
11. Reportable exceptions (Rule 308(3): 40 CFR 262.42)(a).				
a) number of manifests generator HASN'T receive signed copy from TSD w/in 35 days:				
b) number of manifests generator HASN'T submitted exception reports to RA & DEQ after 45 days:				
12. Facility has written program to reduce volume/toxicity/recycle wastes? (Rule 304(1)(b):40 CFR 262.27(a))	262B	[ ]	___	NI N/A
13. Facility discusses program in place to reduce volume/toxicity/recycle of waste (Rule 304(1)(b): 40 CFR 262.27(a))	262B	[ ]	___	NI N/A

LAND DISPOSAL RESTRICTION REQUIREMENTS
WASTE ANALYSIS AND RECORDKEEPING (Rule 311(1): 40 CFR 268.7))

		YES	NO
14. Did the generator determine if the waste is restricted from land disposal? (Rule 311(1): 40 CFR 268.7(a)(1))			
a) all listed waste	268A	[ ]	NI N/A
b) all characteristic wastes?	268A	[ ]	NI N/A

NOTE: *If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))*

15. If restricted waste exceeds treatment standards or prohibitions did notice go w/ initial shipment? (Rule 311(1):40 CFR 268.7(a)(2))	268A	[ ] NI N/A
OR		
16. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (Rule 311(1): (40 CFR 268.7(a)(3))	268A	[ ] NI N/A
OR		
17. If waste has exemption from prohibition on the type of land disposal method utilized for the wasté, did a notice go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(4))	268A	[ ] NI N/A
OR		
18. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(9))	268A	[ ] NI N/A
19. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3)		
a) EPA hazardous waste #?	268A	[ ] NI N/A
b) if wastewater or non-wastewater as defined in 268.2(d&f)?	268A	[ ] NI N/A
c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	268A	[ ] NI N/A
d) manifest number associated with the shipment?	268A	[ ] NI N/A
e) waste analysis data, where available?	268A	[ ] NI N/A
f) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	268A	[ ] NI N/A
UNLESS		
g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9)	268A	[ ] NI N/A
h) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? Rule 311(1): 40 CFR 268 Subpart D & 268.48)	268A	[ ] NI N/A
20. Other than notices for waste exceeding treatment standards, did notices include: (Rule 311(1): 40 CFR 268.7(2)(3)		
a) if the notice is for shipments that meet the standards does the notice include the certification?	268A	[ ] NI N/A
b) if the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?	268A	[ ] NI N/A

NOTE: *An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)*
NOTE: *Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."*

21. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6)	268A	[ ] NI N/A
22. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR268.7(a)(7))	268A	[ ] NI N/A
23. All notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8)	268A	[ ] NI N/A

NOTE: *This requirement (268.7(a)(8)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.*

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (RULE 311(1):40 CFR 268.3)

24. Generator dilute hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR: 268.3(a))	268A	[ ] NI N/A

TREATMENT STANDARDS (RULE 311(1):40 CFR 268.40)

25. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR268.40(c))	268A	[ ] NI N/A

BIENNIAL REPORT (Rule 308: 40 CFR 262.41)

26. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)	262D	[ ] NI N/A
27. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))	262D	[ ] NI N/A

PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)

		YES NO
28. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a):40 CFR262.30))	262C	co.said__obsrvd__ [ ] ___ NI N/A
29. Are waste packages marked & labeled per DOT 49 CFR172 concerning hazardous materials (required before shipping waste off- site)?(Rule 305(1)(b)(c): 40 CFR 262.32(a))	262C	co.said__obsrvd__ [ ] ___ NI N/A
30. On containers of 119 gallons or less, is there a warning, generator's name, address, site identification number, manifest tracking number & waste code per DOT 49 CFR172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	262C	co.said__obsrvd__ [ ] ___ NI N/A
31. If required (>1000 #'s), are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	262C	[ ] ___ NI N/A

ACCUMULATION TIME (Rule 306: 40 CFR 262.34)

32. If hazardous waste accumulated in containers: (If no, skip to #35)		
a) containers have accumulation date which is clearly visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))	262C	[ ] ___ NI N/A
b) container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))	262C	[ ] ___ NI N/A
c) is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))	262C	[ ] ___ NI N/A
d) has more than 90 days elapsed since date marked? (Rule 306(1)	262C	___ [ ] NI N/A

OR

e) one of the following apply:		
i) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	262C	[ ] ___ NI N/A
ii) it is F006 waste recycled for metals recovery in compliance with Rule 306 (7) (180 days maximum). Rule 306(7):40 CFR 262.34(g))	262C	[ ] ___ NI N/A
iii) it is F006 waste recycled for metals recovery in compliance with Rule 306(7) which must be transported more than 200 miles (270 days max.)? (Rule 306(8):40 CFR 262.34(h)	262C	[ ] ___ NI N/A
iv) generator applied for & received extension or exception to accumulate F006 haz waste longer than ii or iii above? (Rule 306(9-10):40 CFR 262.34(i))	262C	[ ] ___ NI N/A

The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).

f) are containers in good condition? (265.171)	262C	[ ] ___ NI N/A
g) are containers compatible with waste in them (265.172)	262C	[ ] ___ NI N/A
h) are containers stored closed? (265.173(a))	262C	[ ] ___ NI N/A
i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b)	262C	[ ] [ ] NI N/A
j) ignitable & reactive wastes stored 15 meters (50 feet) from property line or written approval obtained from local fire prevention code authority for less than 15 meter? (265.176)	262C	[ ] ___ NI N/A
k) are containers inspected weekly for leaks and defects? (265.174)	262C	[ ] [ ] NI N/A
l) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(i))	262C	[ ] ___ NI N/A
m) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(i))	262C	[ ] [ ] NI N/A
n) are incompatible wastes stored in separate containers? (265.177(a))	262C	[ ] [ ] NI N/A
o) hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	262C	___ [ ] NI N/A
p) incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	262C	[ ] ___ NI N/A

Rule 306(2) & 40 CFR 262.34(c)(1) both refer to 40 CFR 265.171, 265.172 & 265.173(a).

33. If hazardous waste is being accumulated at the point of generation:		
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2):40 CFR 262.34(c)(1))	262C	[ ] [ ] NI N/A
b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	[ ] ___ NI N/A
c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	262C	[ ] [ ] NI N/A
d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))	262C	[ ] [ ] NI N/A
e) are container(s) in good condition? (265.171)	262C	[ ] [ ] NI N/A
f) are container(s) compatible with waste in them? (265.172)	262C	[ ] ___ NI N/A
g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))	262C	[ ] [ ] NI N/A
34. If generator exceeds 55 gallons or 1 quart, w/in 3 days does generator, w/respect to that amount of excess waste:		
a) mark the container with the date the excess amount began accumulating? (Rule 306(2): 40 CFR 262.34(c)(2))	262C	[ ] ___ NI N/A
b) move to an area with secondary containment, if required? (Rule 306(1): 40 CFR 264.175))	262C	[ ] ___ NI N/A

Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.

35. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include		
a) impervious base free of cracks? (264.175(b)(1)) :	262C	[ ] ___ NI N/A

b) sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))	262C	[ ] ___ NI N/A
c) hold 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))	262C	[ ] ___ NI N/A
d) run-on prevented unless sufficient capacity? (264.175(b)(4))	262C	[ ] ___ NI N/A
e) accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)5))	262C	[ ] ___ NI N/A

NOTE: Closure of Accumulation Area covered under # 53.

36. If accumulating solids, (other than F020,F021,F022, F023, F026, F027), is haz waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c)(1 & 2))	262C	[ ] ___ NI N/A
37. Is hazardous waste accumulated in other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank? *Explain any yes answer.*		___ ___ NI N/A
38. Waste area protected from weather, fire, physical damage & vandals? (Rule 306(1)(e))	262C	[ ] ___ NI N/A
39. Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, ground-waters, drains or sewers, and such that fugitive emissions do not violate Act 451, Part 55? (Rule 306(1)(f))	262C	[ ] ___ NI N/A
40. Is hazardous waste accumulated in tanks? *If so, complete Tank System inspection form.*		___ ___ NI N/A
41. Is hazardous waste placed on drip pads? *If so, complete Wood Preserving inspection form*		___ ___ NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refers to 265.16

PERSONNEL TRAINING (265.16)

42. Did personnel receive training? (265.16)	262C	[✓] ___ NI N/A
43. Do personnel training records contain the following:		
a) job title? (265.16(d)(1))	262C	[ ] ___ NI N/A
b) job descriptions? (265.16(d)(2))	262C	[ ] ___ NI N/A
c) name of employee filling each job? (265.16(d)(1))	262C	[ ] ___ NI N/A
d) description of type & amount of both introductory & continued training? 265.16(d)(3))	262C	[✓] ___ NI N/A
e) training designed so facility personnel can respond to emergencies? (265.16(a)(3)	262C	[✓] ___ NI N/A
f) records of training? (265.16(d)(4))	262C	[ ] ___ NI N/A
g) do new personnel receive required training within 6 months? (265.16(b)	262C	[ ] ___ NI N/A
h) do training records show personnel have taken part in annual training? (265.16(c))	262C	[ ] ___ NI N/A
i) training by person trained in hazardous waste management procedures? (265.16(a))	262C	[✓] ___ NI N/A

Rule.306(1)(d) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37.

PREPAREDNESS AND PREVENTION (265.30-265.37)

44. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)	262C	co,said__obsrvd_ [✓] ___ NI N/A
45. If required, does this facility have the following:		
a) internal communications or alarm systems? (265.32(a))	262C	[✓] ___ NI N/A
b) telephone or 2-way radios at the scene of operations? (265.32(b))	262C	[✓] ___ NI N/A
c) portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	262C	[✓] ___ NI N/A
d) adequate volume of water and/or foam available for fire control? (265.32(d))	262C	[✓] ___ NI N/A
46. Testing and Maintenance of Emergency Equipment		
a) owner/operator test & maintain emergency equipment to assure operation? (265.33)	262C	[✓] ___ NI N/A
b) has owner/operator provided immediate access to internal alarms? Access to alarm system is applicable **only** if required (40 CFR 265. 32)		
i) when hazardous waste is being poured, mixed, etc. (265.34(a))	262C	[ ] ___ NI N/A
ii) if only one employee on the premises while facility is operating. (265.34(b))	262C	[ ] ___ NI N/A
c) aisle space for unobstructed movement of personnel/emergency equipment? (265.35)	262C	[✓] ___ NI N/A
47. Has the facility made arrangements with local authorities? (265.37(a)&(b))	262C	[ ] ___ NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to Subpart D, 265.50-265.56.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES (265.50-265.56)

48. Plan implemented whenever fire/explosion/release could threaten human health or the environment? (265.51(b))	262C	[✓] ___ NI N/A
49. Does the contingency plan contain the following:		
a) actions personnel must take responding to fires/explosions/unplanned release of hazardous waste? (265.52(a & b))	262C	[✓] ___ NI N/A
b) describe arrangements w/ local police, fire, hospitals, contractors, state & local emergency responders for emergency services; (265.52(c)) & (265.37(a)&(b))?	262C	[✓] ___ NI N/A

c) name, addresses & phone (office & home) of emergency coordinator? (265.52)(d))	262C	[ ] ___ NI N/A
d) list emergency equipment at the facility, including location, physical description & capabilities? (265.52(e))	262C	[ ] ___ NI N/A
e) evacuation plan for personnel w/ signal(s), evacuation routes & alternate evacuation routes. (265.52(f))	262C	[ ] ___ NI N/A
50. Does the facility have an Emergency Coordinator? (265.55)	262C	[ ] ___ NI N/A
Emergency Coordinator and Emergency Procedures:		
a) emergency coordinator familiar with site operation & emergency procedures? (265.55)	262C	[ ] ___ NI N/A
b) emergency coordinator has the authority to carry out the contingency plan? (265.55)	262C	[ ] ___ NI N/A
c) if emergency occurred, did the emergency coordinator follow emergency procedures? (265.56)	262C	[ ] ___ NI N/A
d) fire/explosion/other release of hazardous waste/haz. waste constituents, could threaten human health or environment or generator has knowledge spill reached surface or ground water, did generator notify MDEQ? (Rule 306(1)(d))	262C	[ ] ___ NI N/A
51. Contingency plan Amendments and Copies		
a) amended: fails in emergency; changes in regulations/emergency coordinators/emergency equipment? (265.54)	262C	[ ] ___ NI N/A
b) copies of plan on site and sent to local emergency organizations? (265.53)	262C	[ ] ___ NI N/A

Rule 309 refers to 262, Subpart E except 262.54 & 262.55

INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)

52. Has the facility imported or exported hazardous waste?		___ NI N/A
a) exporting, has the generator:		
i) notified the Administrator in writing <12 months prior to shipment? (Rule 309(1): 40 CFR 262.53(a))	262E	[ ] ___ NI N/A
ii) receiving country consented to accept waste. (Rule 309(1): 40 CFR 262.52(b))	262E	[ ] ___ NI N/A
iii) has copy of EPA Acknowledgment of Consent. (Rule 309(1): 40 CFR 262.52(c))	262E	[ ] ___ NI N/A
iv) complied with manifest requirements in Rule 309(2)(a-h).	262E	[ ] ___ NI N/A
v) if required, was an exception report filled. (309(3)(a-c))	262E	[ ] ___ NI N/A
b) importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	262F	[ ] ___ NI N/A

Rule 306(1)(g) and 40 CFR 262.34(a)(1) refers to 40 CFR 265.111 & 265.114

ACCUMULATION AREA CLOSURE (265.111 & 265.114)

53. The accumulation area must be closed in a manner that:		
a) minimizes need for further maintenance (Rule 306(1)(g): 40 CFR 265.111(a))	262C	[ ] ___ NI N/A
b) controls/minimizes/eliminates, to protect human health & environment, the escape of haz. waste or hazardous waste constituents, leachate, run-off to ground/surface waters and air. (Rule 306(1)(g): 40 CFR 265.111(b))	262C	[ ] ___ NI N/A
c) all contaminated equipment, structures, and soil properly disposed of. (Rule 306(1)(g): 40 CFR 265.114)	262C	[ ] ___ NI N/A

COMMENTS:

ATTACHMENT D

MDEQ Universal Waste Small Quantity Handler (SQH) Inspection Checklist

MID 048 989 891

ATTACHMENT E

MPI Supporting Documentation Log

MID 048 989 891

Attachment E- MPI Inspection Documentation Log MID 048989891

Inspection Date: May 15, 2013

Generator Waste Profile Batteries Universal Waste
Land Disposal Restriction for F003 Acetone, Ethyl Acetate, Methanol and D001 Ignitable 005463987FLE
July 2007 MDEQ Subject: MPI Letter of Warning
May 4, 2007 MDEQ Subject: MID048989981
August 21, 2007 MPI Subject: Response to MDEQ Letter of Warning to MPI
Site Identification Verification Form Signed 4/19/2013
Site Identification Verification Form Signed 2/29/2012
Hazardous Waste Manifest#009785543JJK 4/26/2012
Hazardous Waste Manifest#004020555FLE 9/13/2011
Hazardous Waste Manifest#004036116FLE 9/13/2011
Hazardous Waste Manifest#004037131FLE 12/08/2011
Land Disposal Notification Certification for F003 Methanol and D001 High TOC Ignitable Characteristic Liquids Manifest Document #004777046JJK 2/8/11
Hazardous Waste Manifest#004777046JJK 2/14/2011
Hazardous Waste Manifest#003274001JJK 8/24/2011
Hazardous Waste Manifest#003274361JJK 12/14/2011
Fiscal Year 2011 Hazardous Waste User Charge Invoice
Site Identification Verification Form Signed 4/25/2011
Hazardous Waste Manifest#004778189JJK 2/16/2010
Hazardous Waste Manifest#004778402JJK 10/05/2010
Hazardous Waste Manifest#002380589FLE 10/15/2010
Hazardous Waste Manifest#004007115FLE 12/13/2010
Hazardous Waste Manifest#004007115FLE 12/13/2010
Land Disposal Notification Certification for F003 Methanol and D001 High TOC Ignitable Characteristic Liquids Manifest Document #004007115FLE 12/13/10
Hazardous Waste Manifest#003274001JJK 8/24/2011
Land Disposal Notification Certification for F003 Methanol and D001 High TOC Ignitable Characteristic Liquids Manifest Document #004007115FLE 12/13/10
Hazardous Waste Manifest#002380589FLE 10/15/2010
Land Disposal Notification Certification for F003 Methanol and D001 High TOC Ignitable Characteristic Liquids, D003, D009, D004, U006, D011 Manifest Document #002380589FLE 10/15/10
DLD Drug and Laboratory Disposal Invoice 11/11/2010

Department of Environmental Quality
UNIVERSAL WASTE SMALL QUANTITY HANDLER (SQH) INSPECTION

Facility Name MPI Research Part 2 Rules

Date May 15, 2013 I.D. # MID 048 989 891 1994 PA 451

SQH may choose to manage the following as universal waste when they accumulate quantities of 5000 kg (11,000 lbs) or less of all these wastes on site: antifreeze; batteries [except lead acid batteries managed per R 299.9804]; consumer electronics (devices containing circuit boards, liquid crystal display, or plasma display); electric lamps [fluorescent, high intensity discharge (HID), sodium vapor, mercury vapor, neon, metal halide, incandescent lamps, and cathode ray tubes (CRTs) from computers, televisions, etc.]; mercury items: thermostats, mercury switches, mercury thermometers, waste devices containing only elemental mercury; various pesticides; pharmaceuticals.

Yes/No responses that are outside of the parenthesis are violations.

(NI - Not Inspected N/A - Not Applicable)

PROHIBITIONS (Rule 228(4): 40 CFR 273.11)		YES NO
1. Does SQH dispose of universal waste? (Rule 228(4): 40 CFR 273.11(a))	273.B	[ ] [X] NI N/A
2. Does SQH dilute or treat universal waste, except responding to releases or managing certain waste when included below? (Rule 228(4): 40 CFR 273.11(b))	273.B	[ ] [ ] NI N/A

WASTE MANAGEMENT (Rule 228(4): 40 CFR 273.13, 273.14)

ANTIFREEZE: (Rule 228(4)		QTY HANDLED:
3. Is antifreeze managed in manner to prevent release by containing it in structurally sound packaging that is compatible w/ contents, & kept closed? Are transport vehicles & vessels managed in the same way? (Rule 228(4)(h))	273.B	[ ] [ ] NI N/A
4. Do containers show evidence of leakage, spillage, or damage? If so, are these containers over packed in a container that meets requirements? (Rule 228(4)(h)(ii)(B))	273.B	[ ] [ ] NI N/A
5. If tanks are used to store antifreeze, do they meet requirements in 40 CFR 265 Subpart J except 265.197(c), 265.200, & 265.201? (Rule 228(4) (h) (ii) (C). **[USE TANK CHECKLIST]**	273.B	[ ] [ ] NI N/A
6. Are containers labeled "UNIVERSAL WASTE ANTIFREEZE" or "WASTE ANTIFREEZE" or "USED ANTIFREEZE"? (Rule 228(4)(h)(iv))	273.B	[ ] [ ] NI N/A
7. If a release occurred, was it immediately cleaned up & properly characterized for disposal? (Rule 228(4)(e)(ii))	273.B	[ ] [ ] NI N/A

BATTERIES: (Rule 228(4) adopts 40 CFR 273 except 273.10 &273.18(h) requirements)		QTY HANDLED:
8. Are batteries managed in way to prevent releases? (Rule 228(4)(a): 40 CFR 273.13(a)	273.B	[ ] [ ] NI N/A
9. Are batteries that show evidence of leakage, spillage, or damage that could cause leaks put in containers that are kept closed, structurally sound, compatible w/ contents of battery, & lack evidence of leakage, spillage or damage that could cause leakage? (Rule 228(4): 40 CFR 273.13(a)(1))	273.B	[ ] [ ] NI N/A
10. Does the handler do any of the following activities w/ batteries as long as the casings of each battery is not breached & remain intact & closed (except to remove electrolyte): sort by type, mix types in container, discharge to remove electric charge, regenerate, disassemble into individual batteries or cells, remove from consumer products, or remove electrolyte? (Rule 228(4)(a): 40 CFR 273.13(a)(2))	273.B	[ ] [ ] NI N/A
11. If electrolyte is removed or other wastes generated from activities in item 10, has it been determined whether it is hazardous waste? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] [ ] NI N/A
a. If electrolyte or other waste is hazardous waste, is it managed in compliance with Parts 260-272 and Part 111? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] [ ] NI N/A
b. If electrolyte or other waste is not hazardous waste, is it managed in compliance with Parts 31, 115 or 121 of 451 & local requirements? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[ ] [ ] NI N/A
12. Are batteries or container(s) of batteries labeled w/ either: "UNIVERSAL WASTE-BATTERIES" or "WASTE BATTERIES" or "USED BATTERIES". (Rule 228(4)(a): 40 CFR 273.14(a))	273.B	[ ] [ ] NI N/A

CONSUMER ELECTRONICS: (Rule 228(4)		QTY HANDLED:
13. Are electronics managed in a manner that prevents breakage or the release of any universal waste or components of universal waste by containing electronics in packaging that will prevent breakage during normal handling conditions? (Rule 228(4)(f)(i))	273.B	[ ] [ ] NI N/A
14. Is packaging in which the electronics are contained labeled either "UNIVERSAL WASTE CONSUMER ELECTRONICS" or "UNIVERSAL WASTE ELECTRONICS"? (Rule 228(4)(f)(ii))	273.B	[ ] [ ] NI N/A
15. Have releases been properly contained, & have residues been characterized, & properly disposed? (Rule 228(4)(f)(iii)	273.B	[ ] [ ] NI N/A
16. Does handler do anything beyond any of the following: repair electronics for direct reuse(Rule 228(4)(g)(i); remove other univ. wastes from cons. electronics (Rule 228(4)((g)(ii)); remove modular components for reuse (Rule 228(4)(g)(iii)	273.B	[ ] [ ] NI N/A

ELECTRIC LAMPS: (Rule 228(4) ;273.13(c);273.14(d)		QTY HANDLED:
17. Are lamps crushed or broken and facility trying to manage as universal waste? **(universal waste electric lamps shall not be crushed or broken under MI rule)** (Rule 228(4)(c)(i)) ***Note: different from EPA regulation***	273.B	[ ] [ ] NI N/A
18. Are lamps managed in a manner to prevent breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with contents of lamps and will prevent breakage, and packaging kept closed? (Rule 228(4(c)(ii))	273.B	[ ] [ ] NI N/A
19. Are lamps or packaging containing lamps labeled either "UNIVERSAL WASTE ELECTRIC LAMP(S)" or "WASTE ELECTRIC LAMP(s)" or "USED ELECTRIC LAMP(s)". (Rule 228(4)(c)(iv)) ***Note: different from EPA regulation***	273.B	[ ] [ ] NI N/A
20. Are lamp fragments or residues, & all lamps that show evidence of breakage, leakage, or damage that could cause release of mercury or other hazardous constituents to the environment immediately contained in packaging that is structurally sound & compatible w/ content, & kept closed? (Rule 228(4)(c)(iii)) ***Note: different from EPA regulation***	273.B	[ ] [ ] NI N/A
21. If lamp fragments or residues are generated, has it been determined whether it is hazardous waste? (Rule 228(4)(c)(iii (B)) ***Note: different from EPA regulation which allows broken lamps to continue to be managed as universal waste***	273.B	[ ] [ ] NI N/A
a. If waste is characteristic is it managed in compliance w/ Part 111, Act 451: 40 CFR Part 260-272?	273.B	[ ] [ ] NI N/A
b. If waste is not characteristic is it managed in compliance w/ Part 115 of Act 451?	273.B	[ ] [ ] NI N/A

MERCURY DEVICES: (Rule 228(4) ; 40 CFR 273.13 & 273.14		QTY HANDLED:
22. Are devices managed to prevent releases? (Rule 228 (4)(d): 40 CFR 273.13(c))	273.B	[ ] [ ] NI N/A
23. Are mercury devices that show evidence of leakage, spillage, or damage that could cause leaks placed in a container that is closed, structurally sound, compatible w/ contents of device, & lack evidence of leakage, spillage or damage that could cause leakage, & designed to prevent the escape of mercury by volatilization or other means? (Rule 228 (4)(d): 40 CFR 273.13(c)(1))	273.B	[ ] [ ] NI N/A
24. Are mercury devices or containers of mercury devices labeled either "UNIVERSAL WASTE THERMOSTAT(S) " or "WASTE MERCURY THERMOSTAT(S)" or "USED MERCURY THERMOSTAT(S)".(Rule 228 (4)(d): 40 CFR 273.14(d))	273.B	[ ] [ ] NI N/A
25. Does handler removing ampules meet the following conditions?		
a. Does facility try to prevent breakage and is doing removal only over a containment device? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(i & ii))	273.B	[ ] [ ] NI N/A
b. Does facility have a clean-up system available to transfer spilled material to another container & use it immediately w/ broken or leaking ampules? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(iii & iv))	273.B	[ ] [ ] NI N/A
c. Is facility area well ventilated & monitored to ensure compliance w/ OSHA exposure limits? (Rule 228 (4)(d): 40 CFR 273.13(c)(2) (v))	273.B	[ ] [ ] NI N/A
d. Does facility have employees familiar w/ proper waste handling & emergency procedures? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	[ ] [ ] NI N/A
e. Are removed ampules stored in closed, non-leaking container that is in good condition? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	[ ] [ ] NI N/A
f. Are removed ampules packed in container with packing material to prevent breakage? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vii))	273.B	[ ] [ ] NI N/A
26. When devices do not contain ampules & handler removes original housings that hold mercury, does handler immediately seal original housing to prevent mercury release & follow all ampule management requirements? (Rule 228 (4)(d): 40 CFR 273.13(c)(3))	273.B	[ ] [ ] NI N/A
27. If waste is generated from removal of ampules or housings, or if clean-up residues are generated, is it determined if it is hazardous waste? (Rule 228 (4)(d): 40 CFR 273.13(c)(3)(i))(A&B), 273.13(c)(4)(i)	273.B	[ ] [ ] NI N/A
a. If waste is characteristic, is it managed in compliance w/ part 260-272 and Part 111? (Rule 228 (4)(d): 40 CFR 273.13(c)(4)(ii))	273.B	[ ] [ ] NI N/A
b. If waste is not hazardous waste, is it managed in compliance w/ Parts 115 & 121 of Act 451, as applicable? Rule 228 (4)(d): 40 CFR 273.13(c)(4)(iii))	273.B	[ ] [ ] NI N/A

PESTICIDES: Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h)		QTY HANDLED:
28. Handler prevents releases by containing pesticides in containers that are closed, structurally sound & compatible w/ pesticide, & does not show evidence of leakage, spillage or damage? (Rule 228(4)(a): 40 CFR 273.13(b)(1))	273.B	[ ] [ ] NI N/A
29. If original container is in poor condition, is it over-packed in acceptable container? (Rule 228(4)(a): 40 CFR 273.13(b)(2))	273.B	[ ] [ ] NI N/A
30. If stored in tank, are requirements of 40 CFR Part 265, Subpart J met except 265.197(c), 265.200, & 265.201? **[USE TANK CHECKLIST]** (Rule 228(4)(a): 40 CFR 273.13(b)(3))	273.B	[ ] [ ] NI N/A
31. If stored in transport vehicle or vessel, is it closed, structurally sound & compatible w/ pesticides & shows no evidence of leakage, spillage or damage?? (Rule 228(4)(a): 40 CFR 273.13(b)(4))	273.B	[ ] [ ] NI N/A
32. Are pesticides in a container, tank or transport vehicle labeled either "UNIVERSAL WASTE-PESTICIDE(s)" or "WASTE-PESTICIDE(s)" (Rule 228(4)(a): 40 CFR 273.14(b) **[See 273.14(c) if 273.14(b) not possible]**	273.B	[ ] [ ] NI N/A

PHARMACEUTICALS: (Rule 228(4)		QTY HANDLED:
33. Are pharmaceuticals managed in a manner to prevent release of any universal waste or components of universal waste by containing pharmaceuticals in structurally sound packaging that is compatible w/ contents & will prevent breakage, & kept closed? Are containers that do not meet these conditions over packed in a container that does? (Rule 228(4)(e)(i))	273.B	[ ] [ ] NI N/A
34. Does handler disassemble packaging & sort pharmaceuticals? (Rule 228(4)(e)(iii))	273.B	[ ] [ ] NI N/A

35. Are incompatible pharmaceuticals segregated & adequate distance maintained to prevent contact w/ incompatible materials? (Rule 228(4)(e)(iv)	273.B	[ ] ___ NI N/A
36. If a release occurred, was it immediately cleaned up and properly characterized for disposal? (Rule 228(4) (e) (ii))?	273.B	[ ] ___ NI N/A

ACCUMULATION TIME LIMITS (Rule 228(4): 40 CFR 273.15)

37. Is universal waste accumulated one year or less? (Rule 228(4)(a): 40 CFR 273.15(a)) (if no go to question 38)	273.B	[ ] ___ NI N/A
38. If accumulated over one year, is accumulation necessary to facilitate proper recovery, treatment or disposal? (burden on handler to demonstrate) (Rule 228(4)(a): 40 CFR 273.15(b))	273.B	[ ] ___ NI N/A
39. Is length of time universal wastes stored documented by one of the following:		
a. container marked or labeled w/ earliest date when universal waste became a waste? (Rule 228(4)(a): 40 CFR 273.15(c)(1))	273.B	[ ] ___ NI N/A
b. individual items of universal waste marked or labeled w/ earliest date it became a waste?? (Rule 228(4)(a): 40 CFR: 273.15(c)(2))	273.B	[ ] ___ NI N/A
c. inventory system maintained on-site that identifies date each item became a universal waste? (Rule 228(4)(a): 40 CFR 273.15(c)(3))	273.B	[ ] ___ NI N/A
d. inventory system maintained on-site that identifies earliest date items in a group or group of containers became a universal waste? (Rule 228(4)(a): 40 CFR (273.15(c)(4))	273.B	[ ] ___ NI N/A
e. universal waste placed in a specific accumulation area & the earliest date is identified when waste was first put in area or date received? (Rule 228(4)(a): 40 CFR (273.15(c)(5))	273.B	[ ] ___ NI N/A
f. any other method when demonstrates length of time universal waste accumulated & date it became a waste or received? (Rule 228(4)(a): 40 CFR (273.15(c)(6))	273.B	[ ] ___ NI N/A

EMPLOYEE TRAINING (Rule 228(4): 40 CFR 273.16)

40. Are employees familiar w/ universal waste handling/emergency procedures, relative to their responsibilities? (Rule 228(4): 40 CFR 273.16)) must	273.B	[ ] ___ NI N/A

RESPONSE TO RELEASE (Rule 228(4): 40 CFR 273.17)

41. Are releases of universal waste & other residue immediately contained? (Rule 228(4): 40 CFR 273.17(a))	273.B	[ ] ___ NI N/A
42. Is material from release characterized? (Rule 228(4): 40 CFR 273.17(b))	273.B	[ ] ___ NI N/A
43. If released material is hazardous waste is it managed as required under Parts 260 – 271 and Part 111? (Rule 228(4): 40 CFR 273.17(b))	273.B	[ ] ___ NI N/A

OFF-SITE SHIPMENTS (Rule 228(4): 40 CFR 273.18

44. Is waste sent to another handler, destination facility or foreign destination? (Rule 228(4)(a): 273.18(a))	273.B	[ ] ___ NI N/A
45. If the SQH self-transports waste, does it comply with the universal waste transporter requirements? (Rule 228(4)(b)	273.B	[ ] ___ NI N/A
46. If waste is a USDOT hazardous material, are USDOT requirements met w/regard to package/labels/ marking/placards/shipping papers? (Rule 228(4)(a): 273.18(c))	273.B	[ ] ___ NI N/A
47. Prior to shipping universal waste off-site did receiver agree to receive shipment? (Rule 228(4)(a): 40CFR 273.18(d))	273.B	[ ] ___ NI N/A
48. If universal waste shipped off-site is rejected by other handler or destination facility, did originating handler either:		
a. receive the waste back? (Rule 228(4)(a): 40 CFR 273.18(e)(1))	273.B	[ ] ___ NI N/A
b. agree to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(e)(2)	273.B	[ ] ___ NI N/A
49. If handler rejects part or full load from another handler, did receiving handler contact originating handler & discuss either:		
a. sending the waste back to originating handler? : (Rule 228(4)(a): 40 CFR 273.18(f)(1)) OR	273.B	[ ] ___ NI N/A
b. agreeing to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(f)(2))	273.B	[ ] ___ NI N/A
50. If handler received shipment of hazardous waste that is not universal waste, was the WHMD District Supervisor or designee immediately notified? (Rule 228(4)(a)):40 CFR 273.18(g))	273.B	[ ] ___ NI N/A
51. If handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance w/ applicable waste regulations (e.g. solid, liquid industrial, or medical waste)? (Rule 228(4)(a): 40 CFR 273.18(h))	273.B	[ ] ___ NI N/A

EXPORTS (Rule 228(4): 40 CFR 273.20)

52. If waste is sent to a foreign destination does handler:		
a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 &6) and(b) and 262.57? (Rule 228(4): 40 CFR 273.20(a))	273.B	[ ] ___ NI N/A
b. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(4): 40 CFR 273.20(b))	273.B	[ ] ___ NI N/A
c. provide copy of EPA Acknowledgement of Consent to transporter? (Rule 228(4): 40 CFR 273.20(c))	273.B	[ ] ___ NI N/A

TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)

53. Does transporter dispose of universal waste? (Rule 228(6): 40 CFR 273.51(a))	273.D	___ [ ] N/A
54. Does transporter dilute or treat universal waste, except if responding to releases? (Rule 228(6): 40 CFR 273.51(b))	273.D	___ [ ] N/A
55. If transporting responds to release, do they immediately contain it and characterize residue? If hazardous waste, does transporter meet requirements in 40 CFR 262? (Rule 228(6): 40 CFR 273.54))	273.D	[ ] ___ N/A
56. If universal waste stored at transfer facility over 10 days, does transporter meet applicable handler requirements? (Rule 228(6): 40 CFR 273.54))	273.D	[ ] ___ N/A
57. Does transporter comply w/ USDOT requirements for package/labels/marking/placards/shipping papers if universal waste is also hazardous material? ***Shipping papers cannot describe universal waste as "hazardous waste, (l) or (s), n.o.s." nor have waste added to USDOT proper shipping name.*** (Rule 228(6)(a): 40 CFR 273.52 and 273.55(b))	273.D	[ ] ___ N/A
58. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56)	273.D	[ ] ___ N/A
a. has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(a)	273.D	[ ] ___ N/A
b. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))	273.D	[ ] ___ N/A

COMMENTS:

Hazardous Waste Manifest#005463987FLE 03/13/2013
Hazardous Waste Manifest#005463988FLE 03/12/2013
Hazardous Waste Manifest#005463989FLE 03/12/2013
Hazardous Waste Manifest#005467306FLE 03/13/2013
Land Disposal Notification Certification for D001, D002, U188, U123 Manifest Document #005463988FLE 3/13/13
Hazardous Waste Manifest#009465498JJK 11/11/2012
Land Disposal Notification Certification for F003 and D001 Manifest Document #0040446561FLE Land Disposal Notification Certification for D001, D002, D003, D007, D011, and P105 Manifest Document #004037130FLE 3/5/12
DLD Drug and Laboratory Disposal Invoice 05/09/2012
Hazardous Waste Manifest#004046561FLE 03/05/2012
Hazardous Waste Manifest#004037130FLE no DF signature
Hazardous Waste Manifest#009465498JJK 01/11/2012
DLD Drug and Laboratory Disposal Invoice 11/09/2011
Hazardous Waste Manifest#004020555 09/13/2011
Hazardous Waste Manifest#004036116 09/13/2011
Land Disposal Notification Certification for D001, D002, F003 Manifest Document #004036116FLE 09/13/11
Generator Waste Profile Form Spent Laboratory Solvents (Bulk)
Land Disposal Notification Certification for D001, D002, F003 Manifest Document #004020555FLE 9/13/11

ATTACHMENT F

MPI Post-Inspection Log

MID 048 989 891

Attachment F- MPI Post-Inspection Documentation Log MID048989891

Inspection Date: May 15, 2013

Description
1# Site Map Facility Relative to Surrounding Area
2# Outdoor Chemical Storage Area Overview
3# Indoor Chemical Storage Area Overview
4# Outdoor Chemical Storage Area Overview
5# Site Plan, Indoor Chemical Storage Pictures
POL-DRP5 PDF Effective 03/01/13
Pollution Incident Prevention Plan 2013 Spill Contingency Plan for MPI Research
POL-SHE-17 MPI Response Emergency Action Plan (EAP)
Waste Handling Training Matrix
Generator Waste Profile Form (Absorbents with Formalin- Debris Rags/Materials containing Formalin)
Generator Waste Profile Form (Formaldehyde D001 and D002)
Generator Waste Profile Form (Hydrochloric Acid D002)
Generator Waste Profile Form (Spent Laboratory Solvents Xylene, Alcohol F003, D001)
Generator Waste Profile Form (Spent Oil for Equipment)
Exylim Weekly Report 2011-2013 Hazardous Waste Building
Exylim Weekly Report 2011-2013 EZA
IMG 163
IMG 174
IMG178
IMG163
Lion RCRA Training 030912
RCRA Waste Management Training Listing
Waste Handling Overview and Safety 042913
Attachment#1 Site Map
Attachment#2 Site Map
Attachment#3 Site Map
Attachment#4 Site Map
Attachment#5 Site Map
POL DPR 6-Corporation Disaster Recovery Hazardous Materials Plan 03-01-13
Pollution Incident Prevention Plan June 2013
POL SHE 17 Emergency Plan
Waste Handler Training Matrix
Waste Profile Absorbent with Formalin
Waste Profile Formaldehyde
Waste Profile Hydrochloric Acid
Waste Profile Lab Waste (alcohol)
Waste Oil
MPI Evaluation Observation
Exylim Evaluation Observation 2011-2013
Supplemental Training Records

Description
Excel RCRA Waste Management Training
Waste Handling Overview
Image Photo#163
Image Photo#174
Image Photo#178
Image Photo#163